GEOGRAPHIC ENFORCEMENT INITIATIVE

MULTI-MEDIA INSPECTION REPORT

SHERWIN-WILLIAMS COMPANY

11541 SOUTH CHAMPLAIN AVENUE

CHICAGO, ILLINOIS

INSPECTION DATES: AUGUST 20-24, 1990

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TABLE OF CONTENTS

FIGURES

TABLES

APPENDICES

EXECUTIVE SUMMARY

I. INTRODUCTION AND PURPOSE

In FY'90, the Geographic Enforcement Initiative (GEI) Task Force selected four facilities in the Southeast Chicago/Northwest Indiana area for Multi-Media inspections. The Sherwin-Williams Company located at 11541 South Champlain Avenue, in Chicago, Illinois was one of the four facilities. The purpose of these inspections was to evaluate their stature with the following environmental statutes:

- Clean Water Act (CWA)
- Resource Conservation and Recovery Act (RCRA)
- Toxic Substances Control Act (TSCA)

In addition and based upon a preinspection meeting with Vilma Cantu, Environmental Engineer, Denny Dart, Mechanical Engineer, and Michelle Farley, Environmental Engineer, of the Air Compliance Branch, it was decided to conduct a reconnaissance/inventory inspection for the air sources. The reason for this was due to the limited amount of information in the U.S. EPA's air files. The scope of the inspection was to evaluate the subject facility but not limited to the federally approved State Implementation Plan (SIP) rule 35 Ill. Adm. Code 215 Subpart K: Use of Organic Material (See Appendix XIX). The Illinois Environmental Protection Agency's (IEPA) - Maywood air files were reviewed prior to the inspection. This was to gain more insight and obtain more information about the company.

This report discusses the findings of the Multi-Media inspection conducted at this facility between August 20-24, 1990. However, only a plant tour was conducted on August 20, 1990 since Mr. Robert C. Martin, the division director for Environmental Services was unavailable. This is due to the fact that the facility was not notified prior to the inspection. Therefore, the actual inspection was conducted between August 21-24, 1990 when Mr. Robert C. Martin was present.

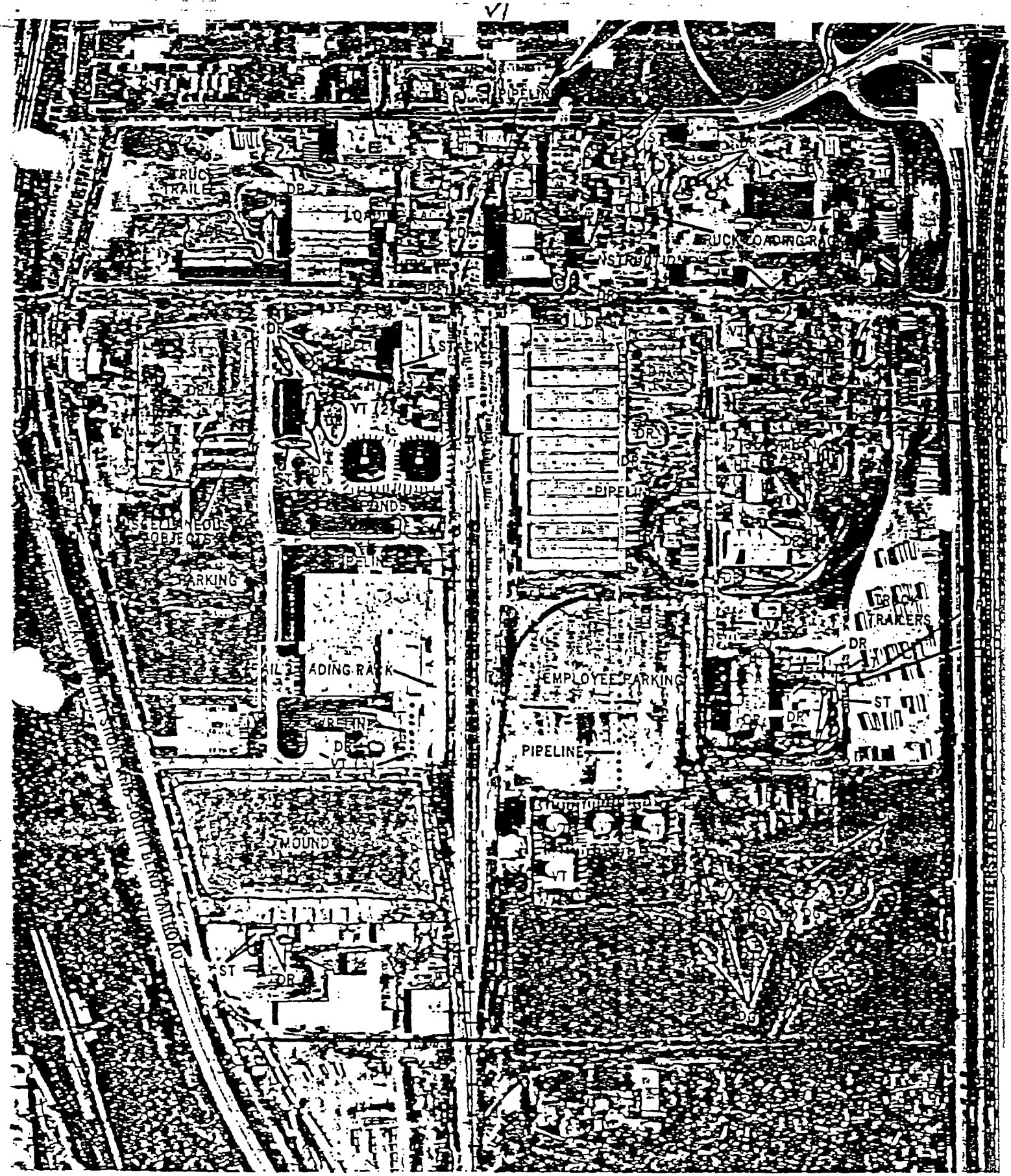
The IEPA was notified of this inspection, but did not participate.

II. PRIMARY SITE CONTACTS AND U.S. EPA PARTICIPANTS

Upon arrival at the site all U.S. EPA inspection participants presented credentials to facility personnel. The U.S. EPA inspection team members consisted of Mr. Howard Caine, Environmental Engineer, Ms. Vilma Cantu, Environmental Engineer, Ms. Denny Dart, Mechanical Engineer, and Mr. Gerald Golubski, Environmental Engineer. The facility was represented by Mr. Robert C. Martin, Division Director - Environmental Sciences for Sherwin-Williams Company, and Mr. George Martin, Director of Engineering Design. Also contacted during the course of the inspection were Ms. Pat Freeman, Environmental Technician, Mr. Bill Lukes, Plant Manager - Resin Plant, and Mr. Bill Perry, Plant Manager - Emulsion Plant.

Although, both the Illinois EPA and the Metropolitan Water Reclamation District of Greater Chicago was notified prior to the inspection, they did not participate. However, information obtained from their respective offices was used in the presentation of this report.

VI



Sherwin-Williams Company, June 6, 1985. Approximate scale, 1 inch equa
355 feet.

During the course of the inspection at Sherwin-Williams facility personnel did not claim any information stated or presented in written form as Confidential Business Information (CBI). No information reviewed by the author at the Illinois EPA office or at the Metropolitan Water Reclamation District office was marked CBI.

III. FACILITY DESCRIPTION

The Sherwin-Williams Company is located in the southeastern part of Chicago, Illinois. The site is situated on 122.8 acres and is bounded by Interstate 94 on the East, 115th Street on the North, 119th Street on the South and by the Chicago South Shore railroad tracks on the West (see attached photograph of the facility).

The company manufacturers solvent and water based paints and resins. The facility began operation in 1884 making paints, varnishes, lacquers, white lead, dry color, DDT and 2-4 D. In addition, metal containers were once manufactured on site as part of their lithographic operations. Approximately 600 people are employed at this site, however, twice that number were employed prior to the sale of their Chemical Division in 1985. According to plant records, twenty-one million gallons of paint were manufactured last year (1989).

Essentially, Sherwin-Williams manufacturers both Water Based Latex house paints (13 million gallons in 1989), and specialty paints (8 million gallons in 1989). Although Sherwin-Williams no longer makes Latex (they purchase this ingredient from a supplier) they still make various paint resins on site (4 1/2 million gallons were made in 1989). Typically, their Chemical Coatings Division makes over 1,400 different paints or paint products (approximately 5,500 paint batches were mixed last year).

Sherwin-Williams is a major emitter of organic compounds due to their manufacturing activities. The company filed an emissions inventory detailing their emissions of styrene, toluene, ethylbenzene, xylenes, various alcohols, ethers, ketones, anhydrides, acrylates, and oils. According to the U.S. EPA Toxic Release Inventory System records, several hundred pounds of each compound are estimated as being released yearly. In addition, the inventory also lists various metals as being released yearly. They include aluminum oxide, chromium compounds, barium, lead, zinc, antimony, nickel, manganese, cadmium, and copper. Estimated emissions for each metal was listed as between 1 to 500 lbs. yearly.

IV. SUMMARY OF FINDINGS

Although, this U.S. EPA inspection was not a sampling inspection such an effort was completed in 1987. Essentially, surface samples were analyzed for organics and inorganics (metals). In summary, that report indicated the presence of compounds normally used in the paint manufacturing process, namely acetone, benzene, ethylbenzene, xylenes, 4,4'-DDD and 4,4'DDT (compounds manufactured in the past), cadmium, chromium, lead, mercury and cyanides. These compounds were also detected in run-off ditches along the property line of Sherwin-Williams. The precipitation runoff from these ditches leads directly to Lake Calumet.

serious deficiency was observed at the facility's Tank Farm A
ocation. Although adequate diking was provided around the storage
nks, an open sewer was located <u>inside</u> the containment area. At
e time of the inspection, the sewer had no cover and its walls
re badly eroded. Moreover, due to a recent rainfall an active
scharge was occurring through the open sewer as witnessed by this
S. EPA inspector.

ner deficiencies in the plan were also noted. Namely, their
ventory tanks was not totally complete and there were no drawings
calculations indicating the diked areas around the tanks were
quate.

respect to their PCB program, U.S. EPA conducted an inspection
1981. Several violations were noted and the Company paid a
000 fine. In 1990 another U.S. EPA inspection was completed.
that time several violations were noted. One PCB transformer
not registered with the local Fire Department until January 30,
5. Also, annual documents for 1978 to 1989 were incomplete.

he time of this inspection, all underground tanks were in the process of being removed.

V. FUTURE PLANS

It appears that future site investigations/assessments at Sherwin-Williams appears to be warranted. The large twenty-five acre site located south of their manufacturing buildings, and the five acre site on the southwest section should be thoroughly evaluated. This is due to the following historical facts;

1. The industralized Southeast area of Chicago area is believed to be heavily contaminated.

2. These two areas were once surface depressions which were several feet deep, however, they are now filled in to street level and above.

3. Soil samples on Sherwin-Williams property have shown to be contaminated due to anthropogenic origins.

4. The ground-water table is believed to be only a few feet below the surface, and there is no evidence that a proper liner was ever constructed beneath these sites.

5. Earlier Illinois EPA visits to the area indicate the underlying surface had solvent smells.

6. The area was reportedly covered with soils and sludges (provided by the Metropolitan Sanitary District) and not with a well engineered final cover. Seepage of the final cover is very probable during precipitation events.

7. There are four aboveground abandoned tanks located next to these old landfills. These 400,000 gallon tanks once contained a variety of manufacturing solvents. These tanks have been taken out of service for at least ten years. Each tank has only an earthen dike which may be permeable to the underlying groundwaters.

On June 29, 1990, the U.S. EPA promulgated a Federal Implementation Plan (FIP) with rules which will apply to Sherwin-Williams. Although the FIP will take effect in one year, Sherwin-Williams may apply for an extension. As a result, only a reconnaissance/inventory inspection was conducted. Essentially, this inspection detailed Sherwin-Williams' plant operations and emission points.

In respect to the facility's Hazardous Waste Program (RCRA) they are no longer regulated as a treatment, storer and disposal (TSD) facility. When the Company sold off their pigment and resin intermediary division to PMC, Inc. in 1985, the Company sought a RCRA status as a generator only (storage of hazardous waste less than 90 days). They were granted this change by the Illinois EPA, however, this did not settle any concerns regarding closure activities on site. In 1989 a U.S. EPA RCRA Facility Report was prepared. Essentially, the report's findings indicated that closure activities at various resin and paint storage areas should be continued. In addition, there are abandoned landfills on site that should be under post-closure care.

During the course of the U.S. EPA inspection, Sherwin-Williams was found to be deficient in their management of Hazardous Waste Containers (unlabeled, undated, and open drums, etc.) located on site. Moreover, the facility was deficient in not having a viable program to remove hazardous waste from points of generation (manufacturing areas) in a timely manner. Also, during the week long inspection in August 1990, the inspection team observed the presence of hundreds of drums containing various liquids and solids which were unlabeled and unidentified. It was uncertain to the inspection team which drums were possibly reusable materials or which were in fact drums of wastes which were not identified, labeled or properly managed.

In respect to the facility's Clean Water Act all discharges are regulated by the Metropolitan Water Reclamation District of Greater Chicago. There are no direct NPDES outfalls at this facility. Currently, Sherwin-Williams discharges nearly 700,000 gallons a day.

According to the Metropolitan Water District, the facility has had a history of non compliance regarding their effluent quality. Numerous exceedances were recorded by the Metropolitan District on samples taken in 1989 and 1990 for fats, oils & greases. In addition, the district is concern with the numerous quantities of chemical solvents present in the effluent. These include methylene chloride, acetone, xylene, chloroform, toluene and ethylbenzene. Other compounds were also detected by Sherwin-Williams contract lab in 1990 (Weston-Gulf Coast Labs). Due to these aforementioned concerns two show cause hearings occurred in 1990 (March 30th and May 2nd). The results of those hearings called for Sherwin-Williams to comply with the Districts Appendix B categorical limits. At the time of the August 1990 inspection, further analytical testing was scheduled by the company.

The facility's current SPCC Plan was prepared by Mr. Robert C. Martin, the division director - environmental sciences division of Sherwin-Williams. Although, this plan was updated from a previous plan prepared by a professional engineer in 1984, the new plan has not received this certification. Mr. Martin is not a registered P.E.

TECHNICAL REPORT

I. BACKGROUND

The Sherwin-Williams Company is located in the southeastern part of Chicago, Illinois. The site is situated on 122.8 acres and is bounded by Interstate 94 on the East, 115th Street on the North, 119th Street on the South and by the Chicago South Shore railroad tracks on the West (see attached photograph of the facility).

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GEOLOGIC AND HYDROLOGIC SETTING

The Lake Calumet region is known physiographically as the Chicago Lake Plain, which at one time was the bottom of Glacial Lake Chicago. Prior to Lake Chicago, unconsolidated tills from the Wisconsin Glaciation were deposited. Lake Calumet once covered an area of approximately 3 1/3 square miles, but due to channel cutting, filling of the land by local industries, and drainage and filling of the swamplands, it is at its (much smaller) present extent.

The soil logs from the west side of the Sherwin-Williams site, indicate that the top 3-7 feet of the subsurface is made up of cinders, topsoil, brick, slag, foundry sand, and clay fill. The next 4-11 feet are made up of mostly of brown silty clay. Gray silty clay with traces of gravel, sand, and shale go down at least 50 feet more. This gray silty clay is believed to be part of the Wadsworth Till Member of the Wendron Formation. In the northeast portion of the site (owned by PMC), the fill is from 6 to 17 feet deep and includes "chemical refuse", cinder, slag, gravel, concrete, topsoil, sand, brick, and clay. The silty brown clay is from 1 to 7 1/2 feet thick below the fill with the gray silty clay (Till) underlying this with a thickness of at least 20 feet. The artificial fill ranges (on average) from 4 to 32 feet in thickness in the area. The Bedrock is a Silurian dolomitic limestone and can be from 0 to 130 feet in depth in the area.

The Sherwin-Williams site is above the 100-year floodplain. The area is relatively flat with natural variations not exceeding five (5) feet.

The depth to the groundwater is from 3 to 6 feet approximating Lake Calumet's surface level. The groundwater gradient from Sherwin-Williams is toward Lake Calumet. Public use water is from Lake Michigan and supplied by the City of Chicago. The region's groundwater is unfit for drinking use and therefore not used.

SURFACE RUNOFF

Since the area is on essentially level ground, there is no predominant surface drainage pattern on site. However, drainage ditches do run along the eastern edge of the frontage road paralleling Interstate 94 and also along the southern border along 119th Street.

Surface runoff from the ditches flows to a discharged area which flows beneath Interstate 94 toward Lake Calumet. On October 6, 1989 Representatives of the Illinois EPA took water samples along the ditch on 119th Street. The water in the ditch was shown to contain traces of 2,4 Dichlorophenol (0.015 mg/l), Naphthalene (0.015 mg/l), Xylene (0.016 mg/l) and Phenols (0.04 mg/l).

LANDFILLED AREA

According to a quadrangle map prepared in 1965 a surface depression was noted along the southeastern portion of the Sherwin-Williams property. Currently, this 25 acre area is level with the street. The company admitted that in 1980, that the area was capped using soils and sludges.

Another surface depression was also noted in a 5 acre area on the southwest portion of Sherwin-Williams property. Today, the area rises approximately 5-10 feet above street level. At the present time very little information about either site is known. Except groundwater samples taken on wells located on the southwestern portion of the Sherwin-Williams property contained lead and arsenic concentrations above the drinking water standards.

PMC PURCHASE OF SHERWIN-WILLIAMS OPERATIONS

On June 30, 1985, the sale of the chemical production division of Sherwin-Williams was completed. PMC Corporation purchased the division for its own pigment and resin intermediaries manufacturing. The purchase divided each company along a north-side roadway (see attached drawing) which was later fenced. PMC operations occurred along the east side of the fence and extend up to the frontage road which parallels Interstate 94. In September 1990 a U.S. EPA multi-media inspection was conducted at PMC. The results of that inspection are contained within a separate inspection report prepared by the U.S. EPA - Region V - Environmental Sciences Division.

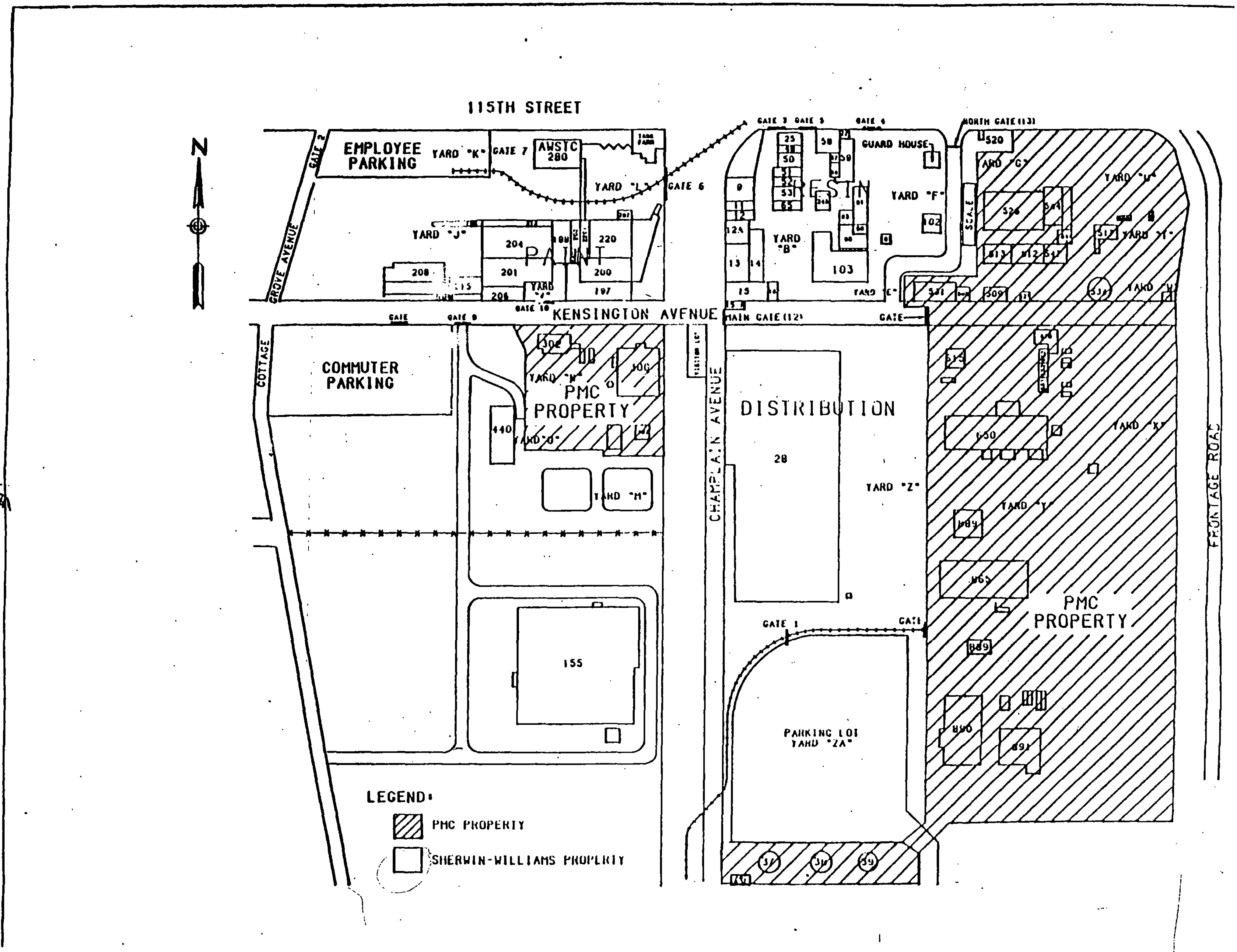
RCRA ACTIVITY

Due to this purchase agreement significant permitting changes resulted. The most significant change occurred in Sherwin-Williams RCRA regulatory status. Prior to the sale, Sherwin-Williams was regulated as a RCRA Treatment, Storer & Disposal (TSD) facility. In their original Part A submittal (November 19, 1980) fifteen hazardous waste units were listed. They include six container storage areas, seven storage tank areas, one surface impoundment and one hazardous waste incinerator. After the sale, Sherwin-Williams requested a change of status as only a RCRA generator. This resulted in PMC in obtaining their own RCRA identification number and Sherwin-Williams initiation of closure activities of their TSD regulatory units. A detailed discussion of RCRA activities at this site is presented within this report.

was any closure performed?

EFFLUENT DISCHARGES

Another significant change which occurred at the time of the sale was in the flow direction of Sherwin-Williams and PMC Corporation effluent discharges. Prior to the sale, Sherwin-Williams operated two surface


115TH STREET
EMPLOYEE PARKING
YARD "K"
GATE 7
AWSTC 280
YARD "L"
GATE 6
GATE 2
GROVE AVENUE
YARD "J"
PAINT
204
220
201
200
208
197
206
GATE 10
GATE
GATE 9
KENSINGTON AVENUE
GATE 3
GATE 5
GATE 4
NORTH GATE (13)
GUARD HOUSE
RESIN
YARD "F"
YARD "B"
103
102
YARD "G"
YARD "U"
YARD "T"
SCALE
MAIN GATE (12)
GATE
COTTAGE
COMMUTER PARKING
PMC PROPERTY
YARD "N"
YARD "O"
440
YARD "M"
155
CHAMPLAIN AVENUE
DISTRIBUTION
28
YARD "Z"
YARD "X"
YARD "Y"
PMC PROPERTY
GATE 1
GATE
PARKING LOT YARD "ZA"
FRONTAGE ROAD
LEGEND:
PMC PROPERTY
SHERWIN-WILLIAMS PROPERTY

impoundments as part of their pretreatment system. After the sale, only Sherwin-Williams utilized the surface impoundments. However, they were later closed (filled in and fenced) when Sherwin-Williams began operating their new wastewater treatment system. Today, there is a complete separation of sewered discharges between Sherwin-Williams and PMC Corporation. Representatives from the Local Metropolitan Sanitary District (Metropolitan Water Reclamation District of Greater Chicago) sample these outfalls on almost a daily basis. Numerous exceedances of some parameters have been reported on the effluent quality. A detailed discussion of these findings are also presented within this report.

The wastewater treatment system at PMC Corporation is discussed in a separate multi-media inspection report which was prepared by this office.

RECENT DEMOLITION ACTIVITIES

Prior to the sale of property to PMC Corporation, Sherwin-Williams demolished several old buildings and various pieces of production equipment without first submitting a closure plan. Subsequently, they were cited by the U.S. EPA for not submitting the necessary closure plan as well as the necessary financial assurance statements. They were fined $8,000.00 as per a Consent Agreement and Final Order that was signed on December 19, 1984. Soon after, Sherwin-Williams submitted an "After the Fact" closure plan for various treatment tanks and for the demolition of the buildings.

AIR EMISSIONS

Unlike a printer of substrates, the Volatile Organic Compound (VOC) emissions from a paint manufacturer are fugitive. The solvent is part of the product and therefore, any VOC releases affect the product composition. Many of the sources of VOC emissions appear to be fugitive at the Chemical Coatings Division - Paint Manufacturing Plant. It is possible, however, that the two baghouses, which control pigment dust particulates, can draw VOCs from the various sources utilized at the Chemical Coatings Division - Paint Manufacturing Plant.

The only way to quantify the VOC emissions would be to have an accurate account of the solvent used by the company and an accurate account of the solvent content of every can produced. Mr. Martin was unable at the time of the inspection to provide this kind of information.

There was also an odor of solvent in the Chemical Coatings Division - Paint Manufacturing Plant which would indicate fugitive emission releases. The U.S. EPA representatives observed various points of where these emissions can occur (See air release emission information in Appendix VIII).

Significant amounts of hydrocarbon emissions were reported by Sherwin-Williams. A summary of VOC emissions have been presented by Sherwin-Williams and is contained in the U.S. EPA's most recent Toxic Release Inventory System. These emissions are due mostly to their paint mixing operations and resins production units. The company's major fugitive and stack air emissions are listed below:

Compound	Fugitive (lb./yr.)	Stack Air (lb./yr.)
Methyl Ethyl Ketone (MEK)	21,579	2,456
Xylene (mixed isomers)	10,283	1,727
Toluene	9,074	15,898
Methyl Isobutyl Ketone (MIK)	8,771	1-500

Moreover, the company listed various inorganic compounds containing Barium, Lead, Chromium, and Zinc. A detailed list of their entire estimated emissions is presented below.

EMISSIONS INVENTORY

According to Sherwin-Williams, the following estimated emissions (lbs.) are released yearly from various areas of their facility.

Compound	Fugitive	Stack Air	POTW	Other
Styrene	1-500	1-500	-	1-500
Toluene	9074	15,898	750	1-500
Ethylbenzene	500-1000	1-500	500-1000	1-500
Xylene (mixed isomers)	10,283	1727	1607	500-1000
Methanol	1-500	1-500	-	1-500
N-butyl Alcohol	1-500	1-500	-	1-500
Sec-butyl Alcohol	1-500	1-500	-	1-500
Glycol Ethers	1613	1-500	1-500	1-500
2-Ethoxyethanol	1-500	-	-	-
Acetone	1-500	1-500	-	1-500
Methyl Ethyl Ketone	21,579	2456	-	1-500
Methyl Isobutyl Ketone	8771	1-500	-	1-500
Maleic Anhydride	-	-	-	1-500
Phthalic Anhydride	-	500-1000	-	-
O-Cresol	1-500	-	-	-
Methyl Methacrylate	-	500-1000	-	-
Ethyl Acrylate	-	1-500	-	-
Butyl Acrylate	-	1-500	-	-
Bis (2-Ethylhexyl) Adipat	1-500	1-500	-	1-500
Dibutyl Phthalate	1-500	-	-	1-500
Cumene Hydroperoxide	1-500	-	-	-
Chlorothalonil	-	-	-	1-500
Aluminum Oxide	-	-	-	1-500
Aluminum (Fume or Dust)	-	-	-	1-500
Chromium Compounds	-	-	-	1-500
Barium	-	1-500	-	2427
Lead	-	1-500	1-500	1-500
Chromium	-	1-500	1-500	1214
Zinc (Fume or Dust)	-	1-500	-	500
Antimony	-	-	-	1-500
Nickel	-	-	-	1-500
Manganese	-	-	-	1-500
Cadmium	-	-	-	1-500
Copper	-	-	-	1-500

Essentially, Sherwin-Williams appears to release commonly used solvents found in paint manufacturing i.e. toluene, ethylbenzene, xylenes (mixed isomers), MEK, MIBK, various alcohols and glycol ethers. The company does not list appreciable amounts of inorganics except for Barium and Chromium.

TANK STORAGE AREAS

According to the facility's current chemical emergency contingency plan (dated December 1989) approximately forty above ground and eight underground tanks are listed. These tanks range in size from 1,000 gallons to 100,000 gallons, however, the majority of the tanks are between 10,000 gallons to 25,000 gallons. They contain Xylene, Naphtha, Toluene, Styrene, MIBK, Mineral Spirts, Soya Oil Alkyds, Various Oils, Solvents and Acetates. A detailed list of each compound is in Appendix XIV.

These tanks are essentially divided into two separate tank farm areas. Both areas have diking, however, one of the diked areas has an open storm sewer which would not contain a spill in the event of a release. According to Mr. Robert Martin, Director, of Sherwin-Williams Environmental Sciences Division, these tank farms are to be replaced within the next few years (perhaps as soon as the end of 1991). Also, the various underground storage tanks are also scheduled for removal. Mr. Robert Martin anticipates that the underground tanks will be closed within a year and replaced with new above ground storage tanks.

TRANSFORMERS & CAPACITORS

On May 27, 1981 representatives of the U.S. EPA conducted a sampling inspection at Sherwin-Williams. Although, the four heat transfer oils and the two hydraulic oils that were tested showed no presence of PCB's, the facility was fined for other violations. Namely, a lack of adequate curbing for the PCB storage area, not documenting monthly inspections and not properly identifying PCB related capacitors. The company subsequently paid a $2,000.00 fine.

In November 1990 (3 months after this inspection) another U.S. EPA Inspection was completed. At that time, no violations were noted.

II. 1987 SURFACE SAMPLING SURVEY

SURFACE SAMPLING STUDY

Three years ago Metcalf & Ed[illegible], Incorporated was contracted by the U.S. EPA to conduct a surfa[illegible] sampling survey of the facility. A sampling survey team obtained twenty-three samples (including blanks) at the facility between October 6-7, 1987. Samples were taken of soils, sludges and surface waters at the facility. These samples were analyzed for inorganics, volatiles, semi-volatile organics and as well as for Pesticides/PCB's. In addition, samples were analyzed for metals.

BACKGROUND LEVELS

Two background samples (SO1 and SO2) were taken at the facility's south parking lot (see attached detailed listing of all sampling point locations). It was initially believed that soils samples at the parking lot would represent areas of minimal contamination. However, upon analysis each sample indicated anthropogenic contamination.

Sample SO1 contained toluene (a compound commonly used in paint manufacturing) in concentration of 6 ug/kg. Sample SO2 contained 4,4'DDE (31 ug/kg) and 4,4'DDT (36 ug/l). In addition, Sample SO1 had a magnesium concentration of 35,000 mg/kg. Typical surface samples have a magnesium concentration of from 0.01 to 9,000 mg/l according to the report.

ORGANICS FOUND IN SOILS & SEDIMENT SAMPLES

Sulfide Oxidizer Tank

Sample SO4 was taken 125 feet south of the facility's sulfide oxidizer tank. The sample contained 12 ug/kg of Carbon Disulfide and 84 ug/kg of Toluene. The report concluded that the soils obtained were contaminated with Carbon Disulfide and Toluene.

117th Street Sample

Sample SO5 was collected 125 feet north of the south fence gate along 117th Street in an area of a swale which was trending in a north-south direction. This sample was analyzed and showed to contain significant amounts of Toluene (11,000 ug/kg) and Total Xylenes (14,000 ug/kg). Also present were traces of ethyl benzene (1,700 ug/l).

119th Street Samples

Sherwin-Williams property extends to 119th Street on the south. Numerous samples along this property line were obtained and analyzed. They include sample numbered SO3, SO6, S10, S14, S15, S19, and S20.

Sample SO6 was obtained 309 feet north of the gate along the south fence on 119th Street by another swale trending in a north-south direction. No organics were detected in the sample obtained by the survey team at that time. However, on October 6, 1989, the Illinois EPA did sample seepage along 119th Street and found 2,4 Dichlorophenol (0.015 mg/l), Naphthalene (0.015 mg/l), Xylene (0.016 mg/l), and Phenols (0.04 mg/l).

Roll-Off Box

Sample SO7 was collected next to a Roll-Off Box 113 feet west of Building 890 and 47 feet south of a hydrant along the fence. Both Xylenes (12 ug/kg) and Arochlor 1254 (a PCB) were detected (4,300 ug/l) in the soil sample.

Sample Number	Sample Type	Sample Location	Sampling Method	Analytical Method
S01	Soil	Background sample collected from 0-12" depth in south parking lot, 239' west of the east fence and 212' south of the north fence.	Drive sampler with a SS sleeve, composite.	VOAs, A/B N, pesticides/PCBs, metals, cyanides.
S02	Soil	Background sample collected from 0-12" depth in south parking lot, 68' south of the north fence and 110' west of sampling point S01.	Drive sampler with a SS sleeve, composite.	VOAs, A/B N, pesticides/PCBs, metals, cyanides.
S03	Soil	Collected from 0-12" depth at 28' south of south fence along 119th Street and 382' west of gate in south fence.	Bucket auger, composite.	VOAs, A/B N, pesticides/PCBs, metals, cyanides.
S04	Soil	Collected from 0-12" depth at 90' west of the railroad tracks and 125' south of the sulfide oxidizer tank.	Bucket auger, composite.	VOAs, A/B N, pesticides/PCBs, metals, cyanides.
S05	Soil	Collected from 0-12" depth at 125' north of the gate in the south fence along 117th Street in a swale trending north-south.	Bucket auger, composite.	VOAs, A/B N, pesticides/PCBs, metals, cyanides.
S06	Soil	Collected from 0-12" depth at 309' north of the gate in the south fence along 119th Street in a swale trending north-south.	Bucket auger, composite.	VOAs, A/B N, pesticides/PCBs, metals, cyanides.
S07	Soil	Collected from 0-12" depth next to roll-off box 112' west of building 890, 50' south of fire hydrant along fence.	Drive sampler with a SS sleeve, composite.	VOAs, A/B N, pesticides/PCBs, metals, cyanides.
S08	Soil	Collected from 0-6" depth next to roll-off box 113' west of building 890, 47' south of hydrant along fence.	Bucket auger, composite.	VOAs, A/B N, pesticides/PCBs, metals, cyanides.

Sample Number	Sample Type	Sample Location	Sampling Method	Analytical Method
S09	Soil	Collected from 0-12" depth at 32' south of gate near pond and 58' west of center of manhole cover.	Bucket auger, composite.	VOAs, A/B N, pesticides/PCBs, metals, cyanides.
S10	Soil	Collected from 0-12" depth at south of south fence along 119th Street and 344' west of gate in south fence.	Bucket auger, composite.	VOAs, A/B N, pesticides/PCBs, metals, cyanides.
S11	Water	Collected from the northwest corner of the east sludge pond.	PVC ladle, grab sample.	VOAs, A/B N, pesticides/PCBs, metals, cyanides.
S12	Water	Collected from the northeast corner of the west pond.	SS ladle, grab sample.	VOAs, A/B N, pesticides/PCBs, metals, cyanides.
S13	Water	Collected at west end of corrugated pipe connecting the two ponds.	Bottles submerged grab sample.	VOAs, A/B N, pesticides/PCBs, metals, cyanides.
S14	Water	Collected at 24' south of south fence in a ditch along the north side of 119th Street and 364' west of gate in the south fence.	SS ladle, grab sample.	VOAs, A/B N, pesticides/PCBs, metals, cyanides.
S15	Water	Collected 18' south of south fence in a ditch along the north side of fence.	SS ladle, grab sample.	VOAs, A/B N, pesticides/PCBs, metals, cyanides.
S16	Sediment	Collected from the edge of the northwest corner of the east sludge pond.	SS ladle, composite.	VOAs, A/B N, pesticides/PCBs, metals, cyanides, EP Toxicity.

Sample Number	Sample Type	Sample Location	Sampling Method	Analytical Method
S17	Sediment	Collected from the edge of the northeast corner of the west sludge pond.	SS ladle, composite.	VOAs, A/B N, pesticides/PCBs, metals, cyanides, EP Toxicity.
S18	Sediment	Collected from the edge of the northwest corner of the retention pond.	SS ladle, composite.	VOAs, A/B N, pesticides/PCBs, metals, cyanides, EP Toxicity.
S19	Sediment	Collected 24' south of south fence in a ditch along the north side of 119th Street and 364' west of gate in south fence.	SS ladle, composite.	VOAs, A/B N, pesticides/PCBs, metals, cyanides.
S20	Sediment	Collected at 18' south of south fence in a ditch along the north side of 119th Street and 34' west of gate in the south fence.	SS ladle, composite.	VOAs, A/B N, pesticides/PCBs, metals, cyanides.
S21	Water	Collected from edge of the northwest corner of the retention pond.	PVC ladle, grab sample.	VOAs, A/B N, pesticides/PCBs, metals, cyanides.
S22	Water	Field blank, bottles filled in south parking lot.	Distilled water poured into sample bottles.	VOAs, A/B N, pesticides/PCBs, metals, cyanides.
S23	Water	Field blank, bottles filled by equalization/ retention pond.	Distilled water poured into sample bottles.	VOAs, A/B N, pesticides/PCBs, metals, cyanides.

Another soil sample (SO8) was collected only three feet north along the fence line. That sample had traces of ethylbenzene (9 ug/kg), Total Xylenes (110 ug/kg), 4,4'DDE (1,000 ug/kg), 4,4'DDD (3,100 ug/kg), and 4,4'DDT (1,100 ug/kg). Please note that 4,4'DDE and 4,4'DDT were also located at the south parking lot (background Sample SO2), however, the concentrations were much less (31 ug/kg and 36 ug/kg respectively).

Roadway Soil Along 119th Street

Road soil Sample S10 was collected south of the south fence along 119th Street and 344 feet west of the gate on the south fence (south end of Sherwin-Williams property).

This sample contained volatile organic compounds and extractables above analytical detection limits.

Acetone	360 ug/kg
2-Butanone	87 ug/kg
Benzene	150 ug/kg
Ethyl Benzene	50 ug/kg
Total Xylenes	51 ug/kg
Di-N-Butylphthalate	190000 ug/kg
4,4'-DDD	170000 ug/kg
4,4'-DDT	560000 ug/kg

Northside Ditch Along 119th Street

Sample S19 was collected 24 feet south of a fence located along the north side of 119th Street and 364 feet west of the gate in the south fence. Again, the following organics were detected.

Acetone	60 ug/kg
Benzene	39 ug/kg
4,4'-DDD	4300 ug/kg
4,4'-DDT	1600 ug/kg

Northside Ditch Sample On 119th Street

Sample S20 was collected 18 feet south of the south fence in a ditch along the north side of 119th Street and 34 feet west of the gate along the south fence. The following organics were detected in these soil samples:

Acetone	65 ug/kg
2-Butanone	32 ug/kg
4,4'-DDD	9,000 ug/kg
4,4'-DDT	4,300 ug/kg

METALS FOUND IN SOILS & SEDIMENT SAMPLES

The two background composite soil samples (SO1 and SO2) obtained at Sherwin-Williams south parking lot were analyzed for metals. They were then compared with the median elemental composition of average soils (See Table I). Upon comparing the background samples with the normal distribution of metals commonly found in soils it was shown that the parking lot had a higher concentration of cadmium than typical soils (9.6 mg/kg as compared with a normal distribution of cadmium in soils of 0.01 to 7 mg/kg). However, the authors, believe that the cadmium concentrations in the parking lot were not significantly different than normal soils. Although, they do believe that the amount of magnesium (35,200 mg/kg) did significantly exceed the typical values for this metal (normal range is 400 to 9,000 mg/kg).

TABLE 1

MEDIAN ELEMENTAL COMPOSITION OF SOILS
(November 6, 1984 McClanahan 3370C)

CONCENTRATION IN SOILS mg/kg (ppm)

ELEMENT		MEDIUM RANGE	TYPICAL	SOURCE
Silver	Ag	0.01 - 8	0.4	5
Aluminum	Al	10,000 - 300,000	71,000	1
Arsenic	As	0.1 - 194	11	5
Boron	B	2 - 270	20	1
Barium	Ba	100 - 3,000	500	1
Beryllium	Be	0.1 - 40	0.3	1
Bromine	Br	1 - 110	10	1
Calcium	Ca	LT 150 - 320,000	24,000	7
Calcium	Ca	700 - 500,000	15,000	1
Cadmium	Cd	0.01 - 7	0.5	6
Chlorine	Cl	8 - 1,800	100	1
Cobalt	Co	0.05 - 65	8	1
Chromium	Cr	5 - 3,000	100	6
Copper	Cu	2 - 250	30	1
Fluorine	F	6 - 7070	270	5
Iron	Fe	100 - 550,000	40,000	1 & 5
Gallium	Ga	2 - 100	20	1
Germanium	Ge	0.1 - 50	1	1
Mercury	Hg	0.01 - 4.6	0.098	5
Potassium	K	80 - 37,000	14,000	1
Lanthanum	La	2 - 180	40	1
Magnesium	Mg	400 - 9,000	5,000	1
Manganese	Mn	20 - 18,300	1,000	1, 5 & 6
Molybdenum	Mo	0.1 - 40	2	1 & 6
Sodium	Na	150 - 25,000	5,000	1
Nickel	Ni	0.1 - 1,530	50	1 & 5
Phosphorus	P	35 - 5,300	800	1
Lead	Pb	LT 1 - 888	29	5
Rubidium	Rb	20 - 1,000	150	1
Sulfur	S	30 - 1,600	700	1
Antimony	Sb	0.2 - 150	6	1,2,3 & 4
Scandium	Sc	5 - 55	7	1
Selenium	Se	0.1 - 38	0.4	1 & 6
Silicon	Si	250,000 - 410,000	330,000	1
Tin	Sn	1 - 200	10	1 & 6
Strontium	Sr	LT 3 - 3,500	278	5
Thorium	Th	2 - 13	9	8
Titanium	Ti	150 - 25,000	5,000	1
Thallium	Tl	0.1 - 0.8	0.2	1
Vanadium	V	3 - 500	100	1,6 & 7
Tungsten	W	0.5 - 83	1.5	1
Yttrium	Y	LT 10 - 200	40	1 & 7
Zinc	Zn	1 - 2,000	90	1 & 5
Zirconium	Zr	60 - 2,000	400	1
Cyanide	Cn		0.09	9

Road Soil On 119th Street

Sample SO3 contained road soil which was collected 28 feet south of the south fence along 119th Street and 382 feet west of a gate in the south fence. That sample was analyzed and found to have a lead concentration of 1,200 ug/kg. The background sample (from the parking lot had a concentration of 198 ug/kg).

Sulfide Oxidizer

Sample SO4 was collected from an area south of the sulfide oxidizer. The following metals were detected in this sample and compared with the background level of soils collected in the south parking lot.

	SO4 (mg/kg)	Background (SO1) (mg/kg)
Cadmium	25	9.6
Chromium	107	14
Lead	1490	198
Manganese	1290	240
Mercury	1.0	0.12
Nickel	55	17
Sodium	1240	(599)
Zinc	662	251
Cyanide	0.77	0.29 U

U - Concentration below analytical detection limit

(Value) - Concentration above instrument detection limit but below contract-required detection limit.

117th Street

Soil Sample SO5 was collected from an area north of the gate. This sample contained levels of metals at least two times greater than the concentrations detected in the background soil Sample SO1.

	SO5 (mg/kg)	Background (SO1) (mg/kg)
Cadmium	28	9.6
Chromium	255	14
Cobalt	58	(3.2)
Lead	999	198
Manganese	907	240
Mercury	0.78	0.12
Nickel	171	17
Silver	3.2	1.6 U
Sodium	2260	(599)
Zinc	1000	251
Cyanide	3.6	0.29 U

U - Concentration below analytical detection limit

(Value) - Concentration above instrument detection limit but below contract-required detection limit.

119th Street

Soil Sample SO6 was collected from an area north of the collection area of Sample SO5. Sample SO6 was found to contain levels of metals which significantly exceeded the concentrations detected in background soil Sample SO1.

	SO6 (mg/kg)	Background (SO1) (mg/kg)
Chromium	77	14
Cobalt	(8.1)	(3.2)
Manganese	680	240
Mercury	0.31	0.12

U - Concentration below analytical detection limit

(Value) - Concentration above instrument detection limit but below contract-required detection limit.

119th Street

Soil Sample S10 consisted of road soil. Laboratory analysis of this sample indicated that it contained the following metals at concentrations which significantly exceeded the levels of metals in the background soil Sample SO1.

	S10 (mg/kg)	Background (SO1) (mg/kg)
Antimony	(15)	6.3 U
Chromium	56	14
Copper	549	133
Lead	2580	198
Mercury	0.98	0.12
Sodium	(1500)	(599)
Zinc	983	251
Cyanide	0.61	0.29 U

U - Concentration below analytical detection limit

(Value) - Concentration above instrument detection limit but below contract-required detection limit.

Near Roll-Off Box

Soil Sample SO7 was collected from an area next to a roll-off box. Laboratory analysis of this sample indicated concentrations of metals which were at least two times greater than the concentrations detected in background soil Sample SO1.

	SO7 (mg/kg)	Background (SO1) (mg/kg)
Cadmium	22	9.6
Chromium	173	14
Cobalt	20	(3.2)
Lead	1120	198
Manganese	505	240
Mercury	0.44	0.12
Nickel	41	17
Sodium	1320	(599)
Zinc	749	251

U - Concentration below analytical detection limit

(Value) - Concentration above instrument detection limit but below contract-required detection limit.

Second Sample Near Roll-Off Box

Soil Sample SO8 was collected three feet north of SO7 and near the same roll-off box. This sample contained metals at concentrations two times or more greater than the levels detected in background Sample SO1.

	SO8 (mg/kg)	Background (SO1) (mg/kg)
Cadmium	27	9.6
Chromium	221	14
Cobalt	13	(3.2)
Copper	293	133
Lead	2640	198
Manganese	552	240
Mercury	0.43	0.12
Sodium	2150	(599)
Zinc	1640	251
Cyanide	5.6	0.29 U

U - Concentration below analytical detection limit

(Value) - Concentration above instrument detection limit but below contract-required detection limit.

Pond Area Samples

Sherwin-Williams had two equalization ponds on site in 1987. Each pond had a holding capacity of 1 1/2 million gallons and were part of their pretreatment wastewater system. Subsequently, these ponds were filled in after Sherwin-Williams installed their new wastewater treatment system. Currently, the area is surrounded by a chain link fence. No manufacturing or other activities occur at this area. The ponds were located due south of the power house.

The following analytical results are on the soils, sludges and water samples that were taken from this area during the October 6-7, 1987 sampling survey.

East Pond Soil Sample

Sample S09 was collected 32 feet south of a gate near the (east) pond and 58 feet west of center of a manhole cover.

Soil Sample S09 was collected from near the east pond. This sample contained metals at concentrations at least two times higher than the levels detected in background soil Sample S01.

	S09 (mg/kg)	Background (S01) (mg/kg)
Arsenic	234	38
Cobalt	(6.6)	(3.2)
Manganese	1230	240
Mercury	5.2	0.12
Nickel	34	17
Cyanide	11	0.29 U

U - Concentration below analytical detection limit

(Value) - Concentration above instrument detection limit but below contract-required detection limit.

TREATMENT POND SURFACE WATER SAMPLES

Both the east and west pond surface waters were sampled and analyzed for organics and metals. Sample S11 was collected at the east pond and Sample S12 was collected from the west pond. Also collected were samples from a retention pond along 116th Street (S13 and S18).

The analyticals results on these samples are as follows:

ORGANICS

East Pond

Surface water Sample S11 was collected from the East pond. This sample contained the following compounds above analytical detection limits.

Toluene	4400 ug/l
Total Xylenes	2200 ug/l
Phenol	3100 ug/l
2-Methylphenol	2900 ug/l
4-Methylphenol	44000 ug/l
Benzoic Acid	7300 ug/l
Endosulfan I	0.210 ug/l

West Pond

Surface water Sample S12 was collected from the West pond. Analysis of this sample revealed similar results to that of S11. The following compounds were detected in Sample S12 and not in the field blank Samples S22 and S23.

Toluene	4200 ug/l
Total Xylenes	2200 ug/l
Phenol	2600 ug/l
2-Methylphenol	2800 ug/l
4-Methylphenol	42000 ug/l
Endosulfan I	0.160 ug/l

The authors indicated that the presence of these compounds in Sample S12 may be a result of waste management (practices) or production activities.

Metals

Field blank water Samples S22 and S23 did not contain metals at concentrations above the analytical detection limits. Thus, these analytical detection limits were used for comparison to the levels of metals in environmental surface water samples.

Surface water Samples S11 and S12 were collected from the east and west ponds respectively. These samples contained the following metals at concentrations significantly greater than the analytical detection limits of field blank Samples S22 or S23.

	S11 (ug/l)	S12 (ug/l)	Blanks S22 (ug/l)	Blanks S23 (ug/l)
Aluminum	536	1290	52 U	52 U
Barium	(63)	225	28 U	28 U
Calcium	42400	62800	746 U	746 U
Chromium	51	89	9 U	9 U
Iron	1280	3160	100 U	100 U
Lead	20	70	6 U	3 U
Magnesium	10400	14300	290 U	290 U
Manganese	32	48	6 U	6 U
Nickel	260	208	12 U	12 U
Potassium	6260	5780	500 U	500 U
Sodium	2550000	2580000	1002 U	1002 U
Vanadium	267	789	9 U	9 U
Zinc	230	485	20 U	20 U

U - Concentration below analytical detection limit

(Value) - Concentration above analytical detection limit but below contract-required detection limit

Retention Pond

Sample S13 was collected from the retention pond. This sample was found to contain levels of metals which were at least two times greater than the analytical detection limits of Samples S22 and S23.

	S13 (ug/l)	S22 (ug/l)	S23 (ug/l)
Barium	(65)	28 U	28 U
Calcium	59800	746 U	746 U
Lead	9.9		3 U
Magnesium	48400	290 U	290 U
Potassium	6730	500 U	500 U
Sodium	58400	1002 U	1002 U
Zinc	46	20 U	20 U

U - Concentration below analytical detection limit

(Value) - Concentration above analytical detection limit but below contract-required detection limit

Surface water Sample S14 was collected from a ditch. This sample contained levels of metals significantly greater than the analytical detection limits of metals in field blank Samples S22 and S23.

	S14 (ug/l)	S22 (ug/l)	S23 (ug/l)
Aluminum	(174)	52 U	52 U
Barium	(158)	28 U	28 U
Calcium	179000	746 U	746 U
Copper	79	25 U	25 U
Iron	36900	100 U	100 U
Lead	556	6 U	3 U
Magnesium	25500	290 U	290 U
Manganese	374	6 U	3 U
Potassium	8090	500 U	500 U
Sodium	48400	1002 U	1002 U
Zinc	265	20 U	20 U

U - Concentration below analytical detection limit

(Value) - Concentration above analytical detection limit but below contract-required detection limit

SUMMARY OF FIELD SAMPLING ACTIVITIES

Based upon the analytical results of the soil/sediment and surface water samples collected at Sherwin-Williams Company on October 6 and 7, 1987. They indicate that these samples may be considered contaminated.

The soil and surface water samples were found to contain a large array of organic compounds which are often used as solvents. The authors suggest that the presence of these compounds in the soil and water samples may be a result of cleaning operations at the site.

Also, several chemical precursor organic compounds were detected on site. These include Pesticides/PCB's, 4,4'-DDD and 4,4'-DDT. Endosulfan was detected in the surface water samples collected from the east and west ponds. The authors indicated that the organics detected in the ponds were commonly used in the manufacturing of resins and dyes.

Finally, significant increased amounts of metals were indicated in the soils analyzed from site samples as compared to normal background levels. These metals include chromium, cobalt, copper, lead, manganese, mercury, zinc, and cyanides. These metals are commonly used in paint manufacturing.

SITE CONTAMINATION

In addition to the soils and water sampling effort completed in October 1987, there were other limited sampling events that were conducted in recent years at Sherwin-Williams.

A summary of these surveys are as follows:

- Six RCRA wells were sampled between September 1982 through June 1984. "Analysis from all wells detected, Arsenic, Cadmium, and Lead. The values fluctuate near and above the drinking water standards. At least 10 ppb phenols detected in all wells, some as high as 880 and 2400 ppb. TOX and TOC values elevated".

- Partial EP Toxic Test conducted on west pond sediment in May 1982 detected phenols (at 228 ppm).
- Well borings made in November 1982 detected chemical and paint odors to a depth of 13 feet.
- Four groundwater samples taken in August 1983 from Non-RCRA regulated wells located along the east property line detected lead and arsenic concentrations above the drinking water standards. Also detected were phenols and high TOX and TOC levels.
- Two sampling events on wells in June 1984 by the Illinois EPA showed phenols concentrations between 0 to 1500 ppb.
- Effluent analysis at pond in February 1985 showed presence of aniline (88 ppm), O-Cresol (2 ppm), P-Cresol (35 ppm).

III. CLEAN AIR ACT*

On August 20-22, 1990, Environmental Engineers Gerald Golubski, and Howard Caine, who are both assigned to the Environmental Sciences Division - Central District Office both conducted a reconnaissance/inventory inspection. Vilma Cantu, Environmental Engineer, and Denny Dart, Mechanical Engineer, both assigned to the Air Compliance Branch, also participated in this inspection on August 20 and 21, 1990. The facility was represented by George Martin, Director of Engineering Design; Robert C. Martin, Division Director - Environmental Sciences; Pat Freeman, Environmental Technician, Chemical Coatings Division; Bill Lukes, Plant Manager - Resin Plant, Chemical Coatings Division; and Mr. Bill Perry, Plant Manager - Emulsion Plant, Consumer Division.

PAINT MANUFACTURING PLANT

Paint is manufactured from the mixing of three items - resins, pigments, and solvent. The resins are made in the resin plant and pumped over to the paint plant. (The resin plant will be discussed in the next section). The pigments can consist of titanium dioxide, carbon black, barium compounds, lead carbonates (lead chromate), and calcium carbonates. The solvents used consist of toluene, xylene, methyl ethyl ketone (MEK), and aromatics. The paint plant makes approximately 1400 different products.

* This Clean Air Inspection Report was authored by Mr. Howard Caine, Environmental Engineer with our office.

In manufacturing paint at The Sherwin-Williams many channels can be followed to come up with the final product. The unit operations consist of dry material and drum storage, pumped vehicle storage (resin), pumped solvent storage, wet mixing, ball mills, paste mixers, S.W. mills, myers mixers, high speed dispersers, pre-mix tanks, mixing tanks continuous mills, and thinning and shading tanks. After the product is made the paint either goes to hand filling or to automatic filling machines. All the units are operated under ambient conditions (See flow diagram in Appendix II).

The sources of particulate air pollution are from the paste mixers, S.W. mills, myers mixers, high speed dispersers, pre-mix tanks, and mixing tanks. The particulate emissions are controlled by two Torit Dust Collectors. The Torit Dust Collectors each operate at a flow rate of 14,200 cfm, a pressure drop of 3 inches H_2O, and an efficiency of 99.9%. The particulate matter collected in the Torit Dust Collector goes to the solid waste removal system. There are no particulate emissions from the continuous mills or ball mills (See IEPA operating permits in Appendix III).

The sources of VOC air pollution are from the paste mixers, S.W. mills, myers mixers, high speed dispersers, pre-mix tanks, mixing tanks, pumped vehicle (resin) storage, and pumped solvent storage. None of the VOC emissions are controlled. Emission rates are calculated by mass balance and are based on vapor pressure by using Raoult's law. Mr. Martin stated that the facility uses solvents to clean the floor at the plant. Floor washing VOC emission calculations are based on usage (See Appendix VIII).

VOC emissions occur by displacement in the storage tanks of solvents and the transfer of resins. These emissions also occur during charging of the solvent when making the paint when the lids are open. Mr. Martin stated it is assumed no emissions occur during paint mixing as all the lids are closed. Furthermore, Mr. Martin stated there are no VOC emissions from the continuous bead mills.

The sources of both particulate and VOC air pollution are the paste mixers, S. W. mills, myers mixers, high speed dispersers, pre-mix tanks, high speed dispersers, paste mixers, and mixing tanks. These sources are all connected to the two Torit Dust Collectors. It should be pointed out that the draw on the dust collectors will collect the particulate matter, but will not control VOC emissions.

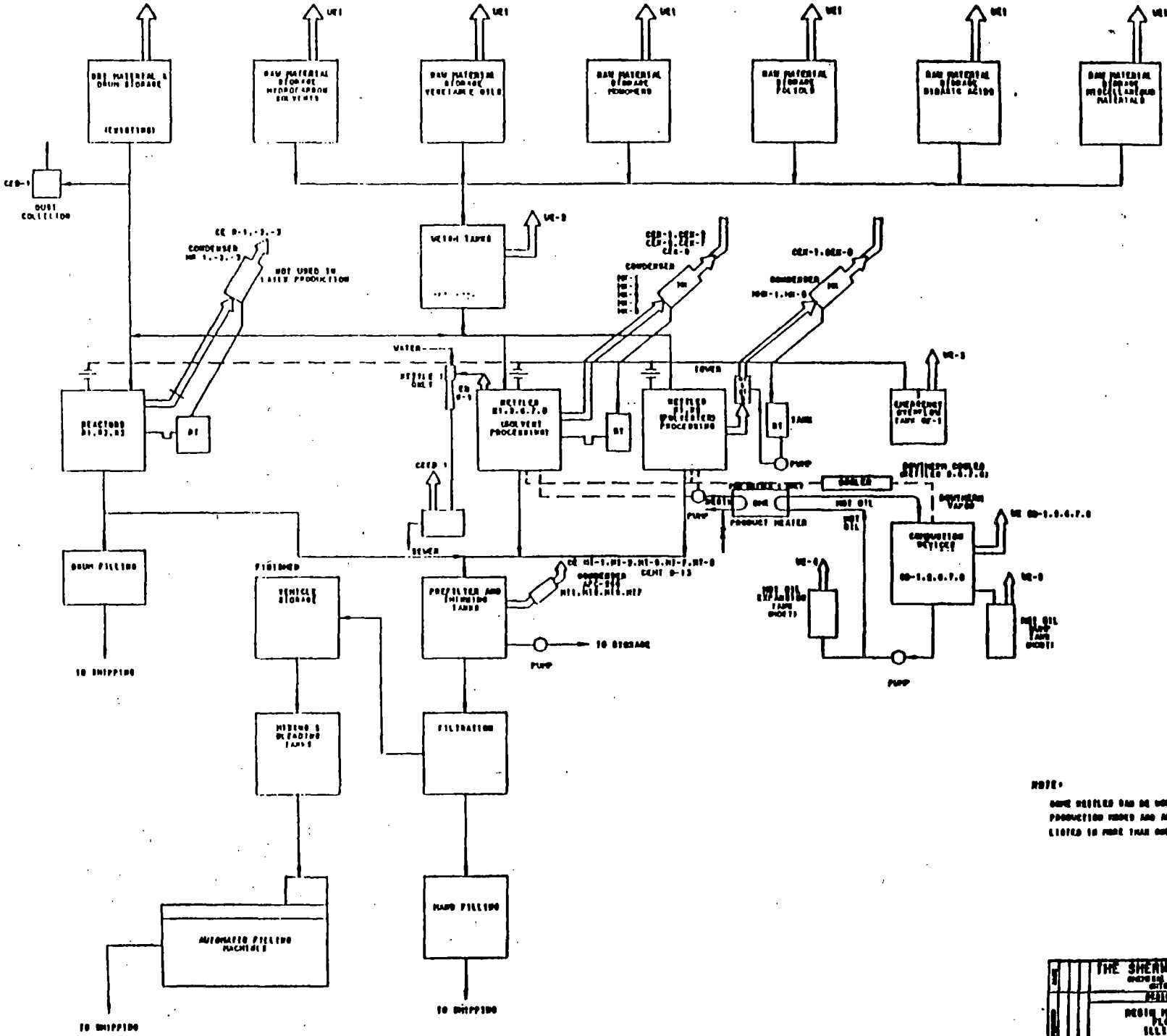
Sherwin-Williams Chemical Coatings Division - Paint Manufacturing Plant does not use flame, thermal, or catalytic incineration, a vapor recovery system, or any other air pollution control equipment to reduce VOC emissions by at least 85 percent and does not have any fuel combustion emission sources. Mr. Martin stated to Denny Dart in a telephone conversation that about 30% of their coatings have less than 20% solvents by weight. Mr. Martin added that overall Sherwin-Williams' coatings generally average 30% solvents by weight.

The findings at the paint plant are as follows:

a) There were no visible particulate emissions observed from either Torit dust collectors during this inspection.

b) No fugitive particulate emissions were observed from any source during this inspection.

c) Based on field observations, solvent management was poor. (i) Open drums and containers were observed unmanned with solvents in them. (ii) Solvents were observed being spilled on the floor during transfer



NOTE:

SOME VESSELS MAY BE USED IN A PRODUCTION MODE AND ARE THEREFORE LISTED IN MORE THAN ONE PLACE.

THE SHERWIN-WILLIAMS CO.

CHEMICAL DIVISION

PAINT DIVISION

RESIN MFG. DEPARTMENT

FLOW DIAGRAM

ILLINOIS E.P.A.

of material from drum to container. Mixing tanks were observed with their lids open. (iv) Transfer vessels containing solvents were observed without lids during the transfer of solvent to mixing tanks. (v) Several windows were open allowing VOC emissions to get into the outside air.

d) Based on the paint floor washing (PFW) data (See Appendix VIII), Mr. Martin provided to the U.S. EPA, one can calculate that the VOC emission rate exceeds 8 lb./hr. (35 Ill. Adm. Code 215.301) based on a 24 hour day and at 250 days a year.

52,700 lb. PFW/yr. x 1 yr./250 days/yr. x 1 day/24 hr./day = 8.78 lb. PFW/hr.

e) Based on the TRI data on page 5 and using the conservative values, one can see that the VOC emissions exceed 8 lb./hr. (35 Ill. Adm. Code 215.301) based on a 24 hr. day and 365 days a year.

72,922 lb. VOC/yr. x 1 yr./365 days/yr. x 1 day/24 hr./day = 8.32 lb. VOC/hr.

It should be noted that this data is not source specific and that some of Sherwin-Williams Resin Plant's air sources fall under 35 Ill. Adm. Code 215.302 (since some of these particular air sources have condensers). Therefore, one needs data from each individual source to calculate the emissions rate accurately.

f) Based on field observations at the paint plant, it appears that the fugitive VOC emission calculations (TRI data), could be underestimated.

RESIN MANUFACTURING PLANT

This plant manufactures resins which are either used in the paint manufacturing plant or sold to customers. The raw materials are dry material (PE, adipic acid, and maleric acid), hydrocarbon solvents, vegetable oils, monomers, polyols, and dibasic acids. The solvents used are mineral spirits, xylene, naphtha, toluene, and other miscellaneous materials. The resin is used to manufacture alkyd paints, acrylics (monomers), and polyesters.

The unit operations consist basically of 4 reactors (R1-R4), 6 kettles (K1, K2, K6-K9), and prefilter and thinning tanks (See flow diagram in attachment). It should be pointed out that a reactor is the same thing as a kettle. The ten reactors have eight prefilter and thinning tanks. After leaving the thinning tank the material goes to a filter press. At this point the resin is reduced of solvent to 60% solids. The product is either sold to a customer or pumped over to the paint manufacturing plant (See flow diagram in Appendix IV).

The sources of particulate air pollution are from the dry storage area where a dust collector is used for pollution control. There are also 6 wet scrubbers used to control fugitive emissions when pouring bags into drums for the reactors and kettles. The wet scrubbers, however, are being phased out. The plant is starting to use a vacuum and screw conveyor on R1 and K9 (See IEPA operating permits in Appendix V).

The sources of VOC air pollution are from the hydrocarbon solvent storage, vegetable oil storage, monomer storage, polyol storage, dibasic acid storage, reactors, kettles, weigh tanks, and the hot oil expansion and dump tanks for the product heater and heat exchanger. There are also VOC emissions during the transfer of VOC materials in the plant and in displacement when filling the storage tanks. The VOC pollution control equipment are the shell and tube condensers for the reactors, kettles, and thinning tanks. There is also a relief tank for the safeties (pressure relief valves) on the reactors and kettles. Mr. Lukes' stated no VOC's are emitted from the filter press.

Another source of air pollution is the combustion equipment for the kettles. These are natural gas boilers (See IEPA operating permits in Appendix V).

Our findings at the resin plant are as follows:

a) There were no visible particulate (point source or fugitive) emissions observed during this inspection.

b) There were visible organic emissions from the K9 condenser exhaust. At approximately 11:30 am (August 21, 1990) liquid solvent was observed coming out of the K9 condenser exhaust. Mr. Golubski assessed an uncontrolled reaction was taking place in K9. Mr. Martin agreed with this assessment.

c) Several stacks on the roof had holes drilled in them for stack testing purposes. Mr. R. Martin stated he was planning on having The Almega Corporation, 607C Country Club Drive, Bensenville, Illinois 60106, (708) 595-0175 conduct some stack tests. He received a phone call later from The Illinois Environmental Protection Agency stating that they wanted to conduct VOC stack tests. As a result he canceled the proposed work with The Almega Corporation. Mr. Caine looked at the stacks and noted that they had a rather small diameter. Mr. R. Martin told Mr. Caine that the stack diameters were about 8 inches. Mr. Caine replied that if the IEPA wants to conduct volumetric flow rates with a pitot tube, then they won't be meeting the requirements of Method 1. 40 CFR Part 60, Appendix A, Method 1, Section 1.2 states, "....The method cannot be used when:... (2) a stack is smaller than about 0.30 meter (12 in.) in diameter,....".

d) No leaks of VOC's were observed from any pumps, valves, etc. during this inspection.

TANK FARM - 11541 SOUTH CHAMPLAIN AVENUE

The tank farm has several solvent storage tanks which are contained in a concrete enclose. These solvents are supplied to both the paint (oil based) plant and resin plant. The resin plant is in charge of the tank farm. All tanks have safety release valves and flame arresters, but have no vapor return units. Mr. R. Martin stated that there have been no vapor releases from the tank farm, however, VOC's do escape by displacement during the filling of the storage tank. Tank farm information is included in Appendix XIV.

CONSUMER PRODUCTS DIVISION - 11700 SOUTH COTTAGE GROVE

The emulsion plant makes latex (water-based) household paints. The paint is manufactured from the mixing of three items - clays, titanium dioxide, and water. The clays are introduced into the high speed dispersers where the material is broken down to small particles. From here the material

is combined with titanium dioxide and water to make the latex paint in the thinning and shading tanks. From the thinning and shading tanks, the material goes to the filling line where the material is packaged and shipped (See flow diagram in Appendix VI).

The sources for particulate air pollution are the four high speed dispersers. The high speed dispersers particulate emissions are controlled by a hood above each high speed disperser which is ducted to two baghouses (See IEPA operating permits in Appendix VII).

The baghouses have a flow rate of 330,000 cfm and are run in series. The dust collected from the baghouses is sent back to the head of the plant where it is reintroduced into the process.

Our findings at the latex paint plant are as follows:

a) There were no visible particulate emissions observed from the exhaust of the baghouses.

b) There were no fugitive particulate emissions observed from any source during this inspection.

IV. RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

Program and Source Description

Sherwin-Williams originally submitted their Part A permit application on November 19, 1980 as a Protective/Precautionary Filer. They listed 15 hazardous waste management units at that time. They included six container storage areas, six storage tanks, one storage surface impoundment and one hazardous waste incinerator. Their U.S. EPA ID number is ILD005456439, and their Illinois EPA ID number is 0316500003.

With the sale of the chemical production division to PMC on June 30, 1985, Sherwin-Williams amended their RCRA permit status. Essentially, they requested that they no longer be considered a regulated TSD. Instead they wanted to be reclassified as a Hazardous Waste Generator only (storage of Hazardous Waste will now be less than 90 days). Subsequently, PMC Corporation also filed for RCRA generator status of hazardous wastes. The amended changes and expected quantities generated are listed in Table II.

WITHDRAWAL APPLICATION

Pursuant to the facility's request for change of their RCRA status a review of their hazardous waste units were evaluated by RMT, Inc. of Madison, Wisconsin. Their report was submitted to our Agency in August 1985. Essentially, the report details the separation of hazardous waste activities between Sherwin-Williams and PMC Inc. PMC, Inc. would be responsible for the management of The IPN Incinerator, the Cresol Process Residue Container Storage Area, the Wastewater Treatment Ponds, and the Powerhouse Solvent Tank (located adjacent to the power house).

CURRENT RCRA ACTIVITIES

The Sherwin-Williams RCRA regulated activities would still occur at their Studel Center (product development research building), Resin Division, and of their Paint Divisions.

STUDEL CENTER

The original Part A listed the Studel Center as having a storage capacity of up to 7,000 gallons of solvent wastes (D001). The wastes were to be placed in containers (S01) and manifested for off-site disposal. Currently, the Studel Center remains active in generating solvent wastes, however, solvent wastes are now placed at Sherwin-Williams Hazardous Waste Accumulation Area.

RESIN DIVISION

The original Part A application indicated that the Hazardous Waste storage capacity of this area would be 50,000 gallons. The waste stored was reported to have been primarily solvents containing off-specification resins (some of which were solidified) which were to be recycled or burned. The waste was listed as being ignitable (D001).

TABLE II

ILD005456439

Original and Updated Part A

1. Waste Numbers	Quantity		
		Amended (6/13/85)	
	Original (11/19/80) Sherwin-Williams	Sherwin-Williams	PMC Industries
F004	1,350 T		430,000 P
K083	1,350 T		*100,000 P
D003	1,831 T		1,750 T
K081	7,575 T		
D001	2,430 T	2,430 T	
D001	182,000 P	182,000 P	
F003	1,050,000 P	1,050,000 P	
F005	1,050,000 P	1,050,000 P	
K078	210,000 P	210,000 P	
K078	3,770,000 P	3,770,000 P	
K080	538,000 P	538,000 P	
K082	4,500 P	4,500 P	
K079	270,000 P	270,000 P	
D001	5,000,000 P	5,000,000 P	
2. Process Codes	T03, S01, S04, S02	S01, S02, T04	S01, S02

In addition to the container storage of off-specification drums of resins, this division also manages four 20,000 gallon wash solvent tanks. These tanks contain spent solvents which are used in cleaning process mixing tanks. Currently, these tanks are still reportedly being used as work tanks for containing cleaning solvents. According to Mr. Robert C. Martin, the tanks are emptied within 90 days after the solvents are declared a waste (i.e. they can no longer reuse the solvents in the tank for cleaning purposes). The wastes in these tanks are listed as F003 and F005.

PAINT DIVISION

A 10,000 gallon container storage area was designated west of the power house. The area has a controlled entrance and a operating closed circuit television camera. The entire area is secured by a series of additional chain link fences and a full time security force which monitors the facility. Waste solvents (D001) are stored in 55 gallon drums which are aligned along a concrete apron (see attached photographs and map).

Typically, the wastes are pumped directly from each drum into a receiving tank of a licensed hazardous waste transporter. The transporters signs a shipping manifest and delivers the wastes to a licensed TSD.

PAINT OVERSTOCK CONTAINER STORAGE AREA

This container storage area has a listed capacity of 250,000 gallons. The storage area is located east of the resin plant. At the time of the inspection, this area was no longer utilized for storing of paint overstock containers.

PROCESS TANKS

Three caustic dip tanks were inadvertently listed as hazardous wastes tanks in 1980. These tanks were actually process manufacturing tanks containing caustic liquids. They are 500 gallons, 3,000 gallons, and 4,800 gallons in size.

DUST COLLECTOR CONTAINER STORAGE AREA

A dust collector is situated on Sherwin-Williams chemical paint division's roof. The entrapped particulate matter is stored in containers until such time as they can be reused in the making of primer paints.

PAINT WASTEWATER SLUDGE INTERCEPTOR TANK

Two 7,500 gallon tanks which ran to the facility's wastewater equalization ponds were taken out of service when Sherwin-Williams removed their equalization ponds.

1989 RCRA FACILITY ASSESSMENT REPORT

Robert A. Fuhrer, completed a RCRA Facility Assessment Report on Sherwin-Williams/PMC Inc. in January 1989 (Mr. Fuhrer is a environmental scientist with the U.S. EPA-Region V Waste Management Division, RCRA Permitting Branch). That report concluded that Sherwin-Williams had listed ten hazardous waste management units, which still remain on Sherwin-Williams property after the sale to PMC Inc. In summary, six units should be withdrawn from the original 1980 filing of RCRA activities (i.e. wastewater treatment ponds, Strudel Center Storage Area, paint wastewater sludge tank, the three paint caustic dip tanks, paint dust collection system, and the four 20,000 gallon resin wash solvent tanks located at Building 51. Three Hazardous Waste Management Units should undergo

closure (i.e., paint overstock storage area, resin overstock closure area, and the paint container storage area). The abandoned landfill should receive post-closure care and monitoring.

PMC Specialties had five solid waste management units as listed in their Part A submittal. The report concluded that one unit should be withdrawn (aniline pitch tank), and three should undergo closure (Powerhouse and Storage Tank, Alkali Blue Storage Drop Box, and the Cresol Pitch Storage Area). The IPN Incinerator should be evaluated further after receiving additional information. A discussion on PMC RCRA regulated activities are contained in a separate multi-media inspection report prepared by this office.

RECENT ILLINOIS EPA FIELD INSPECTIONS

Upon reviewing recent Illinois EPA inspection reports for the Sherwin-Williams Company, the following violations were reported in the past few years:

DATE	CONCLUSIONS OR COMMENTS
August 5, 1982	No inspection logs for either container or tank storage units. No hazardous waste plan. Improper description of wastes on manifests.
August 23, 1983	Treatment in tanks not indicated in Part A Application. The Technical Center located at 10909 South Cottage Grove, Chicago reportedly generates 7,000 lbs./yr. however, not listed on a modified Part A of the new process. Also, a waste analysis plan was not available, also facility lacked proper preparation of their shipping manifests.
August 9, 1984	Many of the aforementioned deficiencies had been corrected. Facility demolished a tank listed in Part A without filing a closure plan. Other violations noted (1) inadequate aisle space in the drum storage area (2) leaking drum (3) no record for past receipts from off site facility.
April 25, 1985	Failure to have a waste analysis plan, lack of employee training, leaking containers, incomplete contingency plan, and incomplete operating records.

January 17, 1986 — Facility withdrawals original Part A TSD application and seeks only generator status.

Justification for withdrawal was submitted September 9, 1985. The following violations at Sherwin-Williams was noted: 1) K082 - T04 did not describe process in their Part A. D001 - T04 did not describe process in their Part A, 2) Approximately sixty-55 gallon drums, some containing material were found south of the Alkali Blue Plant. 725.131 Maintenance and Operation of the facility, 3) Personnel training records did not contain job titles or job descriptions, and 4) the closure plan did not include the estimate year of closure.

Also, the following are violations observed at PMC (1) no inspection schedule, (2) no listing or location of spill control equipment, (3) Contingency Plan was not sent to local emergency organizations, (4) No operating record, and (5) No closure plan.

Other significant findings by the Illinois EPA included:

- Two surface impoundments wastewater treatment lagoons which collects runoff and sewage from the site. Inactive landfill located on the southeast portion of the Sherwin-Williams property.
- Discolored pavement around Alkali Blue Plant. Discoloring around surface impoundments.
- No groundwater monitoring system around surface impoundments since "they (Sherwin-Williams) believe the ponds are not (RCRA) regulated.

(These ponds were subsequently removed when the new wastewater treatment plant became operational).

- Potential for groundwater and surface water contamination which would effect the population and the environment wastes result from production of paints and coatings including both water & solvent based products. produced are many of the resin intermediates used in these coat- In addition to the coatings, the company produces chemical products and in the past had manufactured metal containers.

1989 GENERATOR ANNUAL HAZARDOUS WASTE REPORT

Sherwin-Williams submitted their latest RCRA Generator Report on February 15, 1990. The report details that the following wastes were disposed of as follows:

	HAZARDOUS WAS	TSD	AMOUNT (GALLONS)
1.	Waste Petroleum Naphtha Liquid Automotive Cleaner (D001)	Safety Kleen IND000714428	154
2.	Still Bottoms (F005)	Industrial Fuels & Resources IND980590947	472,776

3.	Waste Paint/ Caustic Wash (F005, D001, D002)	Industrial Fuels & Resources IND980590947	8,500
4.	Resin Sludge (D001)	Industrial Fuels & Resources IND980590947	5,000
5.	Waste Solvent	Industrial Fuels & Resources IND980590947	5,000
6.	Waste Paint (D001)	LWD, Inc. KYD088438817	7,750
7.	Waste Paint (D001, F003)	Heritage Environmental Services ILD085349264	67,175
8.	Waste Still Bottoms (F005)	Safety Kleen MOD029729688	93,089
9.	Waste Still Bottoms (F005)	Lonestar Industries IND006419212	111,300
10.	Waste Corrosive Liquid (D002)	Titan Oil/Metal Works Ind. IND000646950	123,452
11.	Phthalic Anhydride (U190)	Ross Incineration OHD048415665	8,200
12.	Waste Corrosive Liquids (D002)	Clean Harbors ILD000608471	3,550
13.	Lab Packs & Listed Chemicals (D001, D002)	Clean Harbors of Natick, Inc. MAD980523203	486
14.	Waste Paint/ Caustic Wash (D001)	Safety-Kleen KYD053348108	2,047
15.	Waste Paint/ Caustic Wash (D001)	Safety-Kleen ILD980613913	605
16.	Waste Petroleum Naphtha (D001)	Safety-Kleen IND000714428	37

WASTE MINIMIZATION PROGRAM

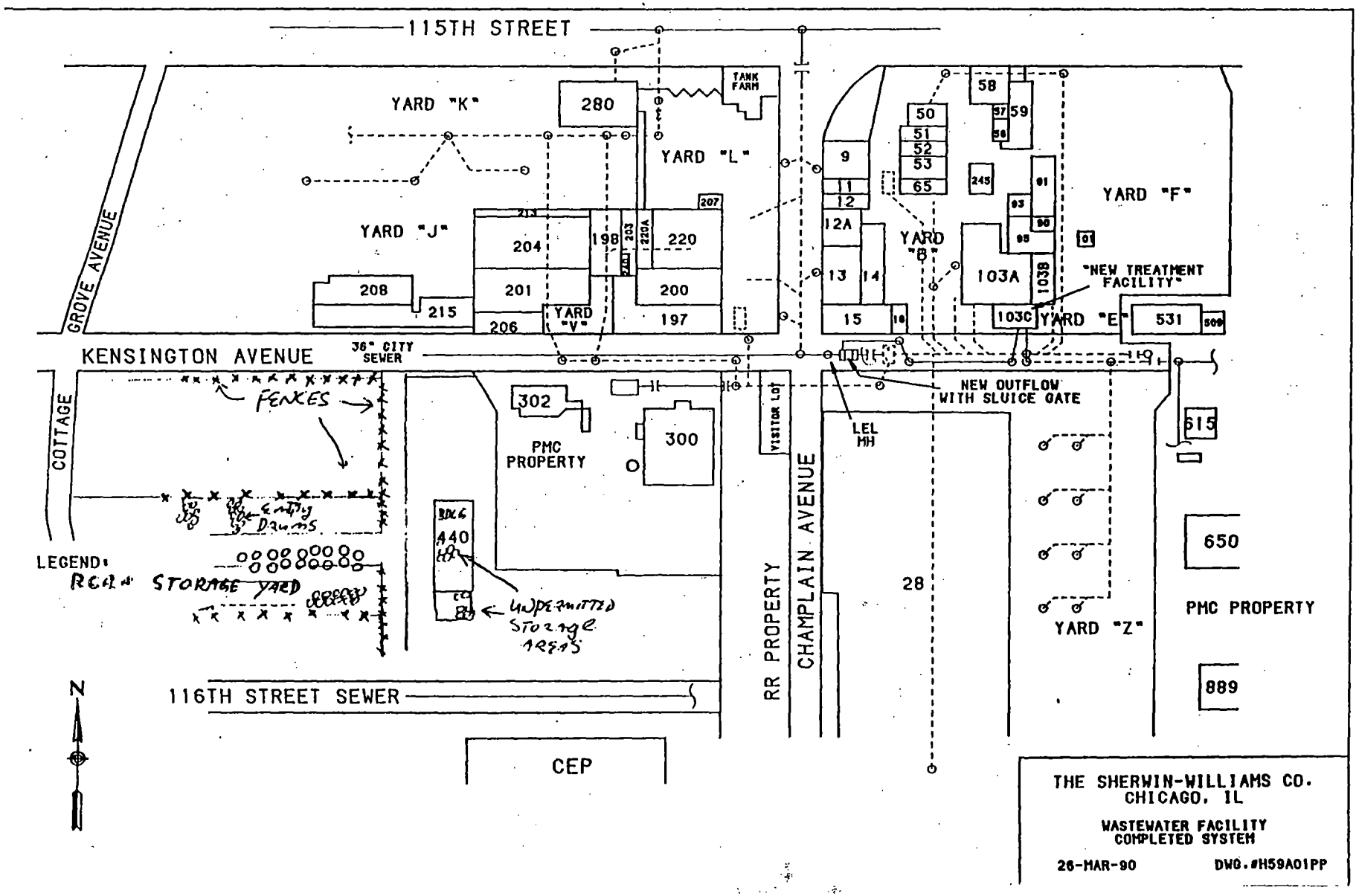
The reduction in still bottom's waste didn't begin until June of 1989. Compared to June through December 1988, there was a reduction of 190,144 gallons (505,100 gallons to 314,956 gallons).

U.S. EPA RCRA INSPECTION

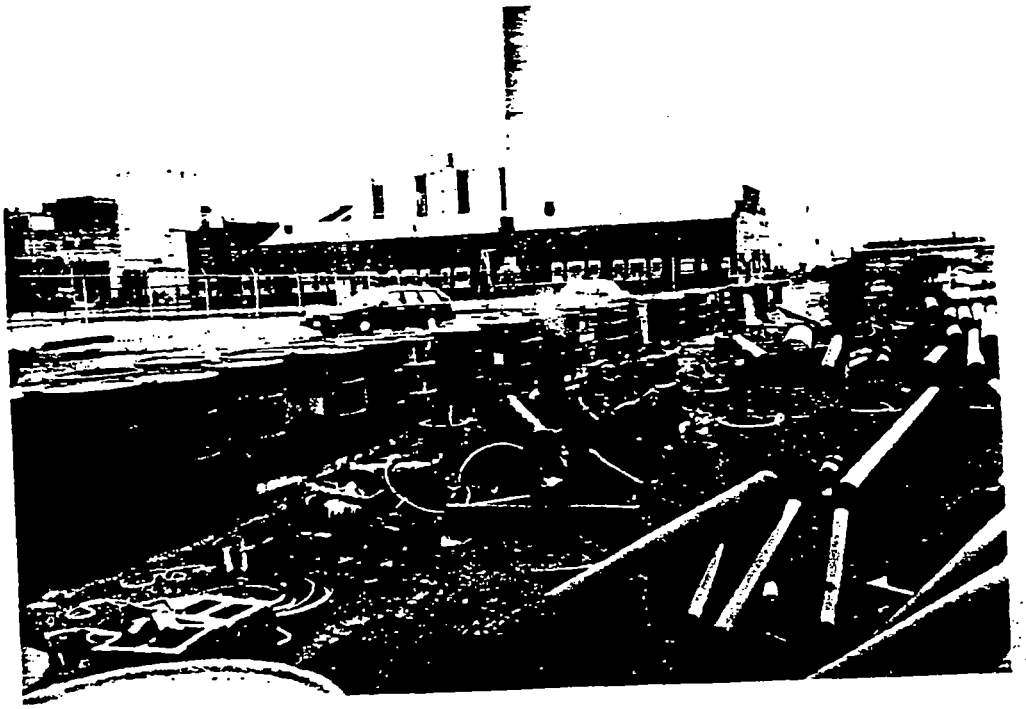
During the August 20-24, 1990 U.S. EPA inspection of the Sherwin-Williams Company each hazardous waste generating area was inspected, as well as the facility's hazardous waste accumulation area. In addition, other inactive areas of Sherwin-Williams were also inspected for RCRA related issues.

In summary, the following deficiencies were observed by the U.S. EPA inspection at the facility's Hazardous Waste Accumulation Area.

REGULATION	COMMENTS
Section 722.131	Numerous hazardous waste drums stored at the facility's accumulation area lacked hazardous waste labels (see attached photographs).
Section 722.132	Numerous hazardous waste drums in storage lacked any marking of generators name and address or the words "Hazardous Waste - Federal Law Prohibits Improper Disposal" (see attached photographs).
Section 722.134	Numerous hazardous waste drums lacked the date upon which accumulation began (see attached photographs).
Section 725.271	Many Hazardous Waste drums were in poor condition and should have had their contents placed into properly conditioned containers (see attached photographs).
Section 725.272	Compatibility of waste with containers. Many drums contained unknown mixtures of wastes (see attached photographs).
Section 725.273	Management of containers. Many hazardous waste drums in storage were stored open (see attached photographs).
Section 725.274	Inspections. Although inspections are documented, the poor condition of the drums indicate that the facility does not have a viable inspection program (see attached photographs).
ction 725.277	Requirements for incompatible wastes. Facility stores hazardous wastes in reusable 55 gallon drums located on a concrete pad. It is uncertain whether the drums are checked for incompatibility when new wastes are introduced.
Section 725.131	Maintenance and Operation of Facility. It appears that the facility does not manage the hazardous waste drums in such a manner as to prevent a runoff to the adjacent soils (see attached photographs). There is no containment structure (curbing) to prevent a release.


115TH STREET
YARD "K"
280
TANK FARM
YARD "L"
YARD "J"
GROVE AVENUE
204
198
220
207
208
215
201
206
YARD "V"
200
197
9
11
12
12A
13
14
15
50
51
52
53
65
58
59
YARD "B"
103A
103B
103C
"NEW TREATMENT FACILITY"
YARD "F"
YARD "E"
531
KENSINGTON AVENUE
36" CITY SEWER
NEW OUTFLOW WITH SLUICE GATE
LEL MH
COTTAGE
FENCES
302
PMC PROPERTY
300
VISITOR LOT
515
Empty Drums
LEGEND:
REAR STORAGE YARD
440
UNPERMITTED STORAGE AREAS
RR PROPERTY
CHAMPLAIN AVENUE
28
YARD "Z"
650
PMC PROPERTY
889
116TH STREET SEWER
CEP
N
THE SHERWIN-WILLIAMS CO.
CHICAGO, IL
WASTEWATER FACILITY
COMPLETED SYSTEM
26-MAR-90
DWG.#H59A01PP

SHERWIN-WILLIAMS
CHICAGO, ILLINOIS

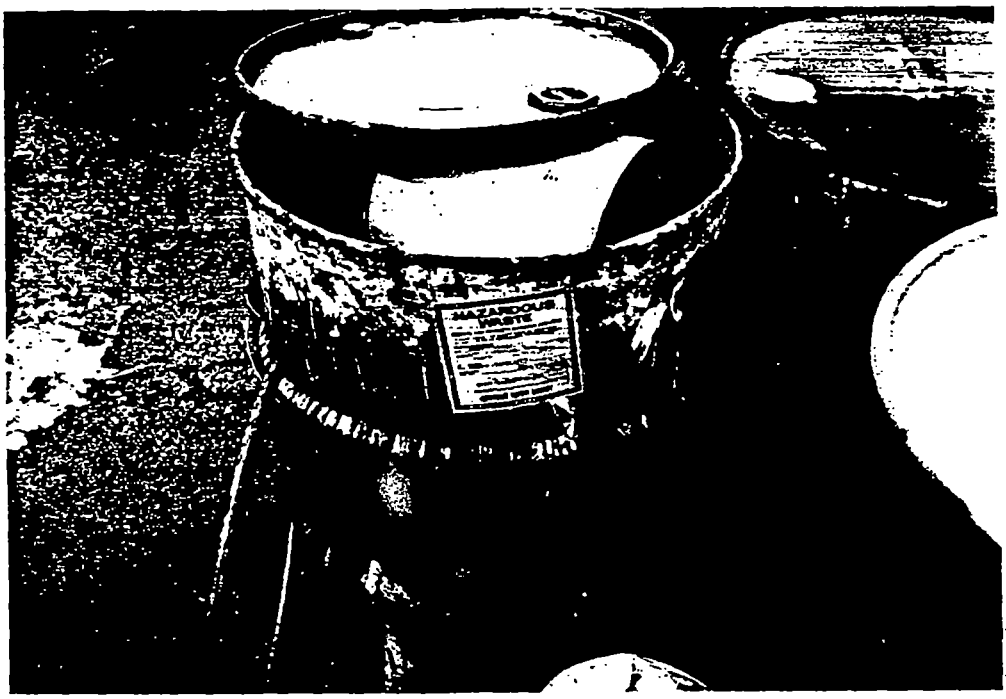


RCRA ACCUMULATION AREA
(BUILDING 440 IS IN BACKGROUND)

SHERWIN-WILLIAMS
CHICAGO, ILLINOIS

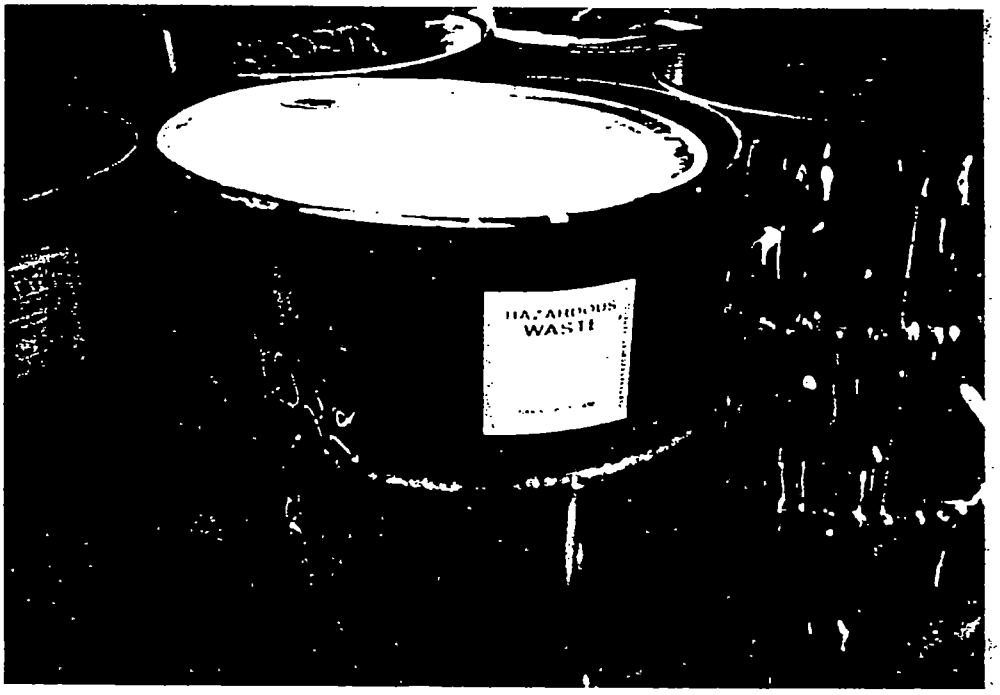
OPEN CONTAINERS OF HAZARDOUS WASTES
AT THE RCRA ACCUMULATION AREA

SHERWIN-WILLIAMS
CHICAGO, ILLINOIS



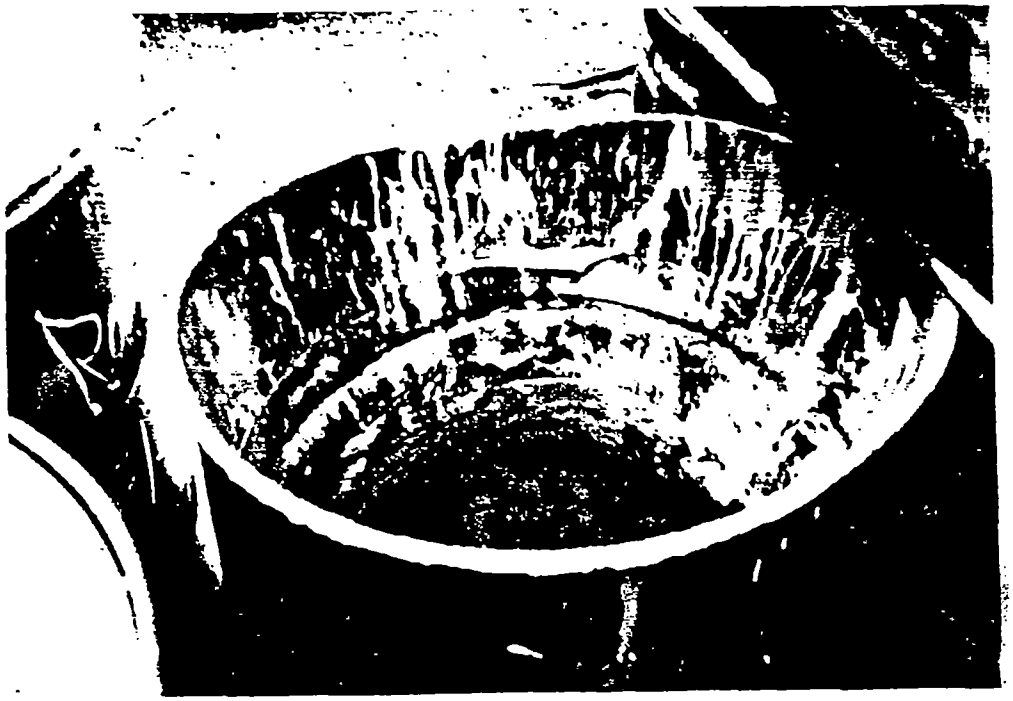
UNKNOWN WASTES STORED IN OPEN CONTAINERS
AT THE RCRA ACCUMULATION AREA

SHERWIN-WILLIAMS
CHICAGO, ILLINOIS



HAZARDOUS WASTE DRUMS WITH OPEN LIDS
AT THE RCRA ACCUMULATION AREA

SHERWIN-WILLIAMS
CHICAGO, ILLINOIS



HAZARDOUS WASTE DRUMS WITH MISSING LID
AT THE RCRA ACCUMULATION AREA

SHERWIN-WILLIAMS
CHICAGO, ILLINOIS

UNLABELED WASTE DRUM
AT THE RCRA ACCUMULATION AREA

SHERWIN-WILLIAMS
CHICAGO, ILLINOIS

UNLABELED DRUM OF WASTE
AT THE RCRA ACCUMULATION AREA

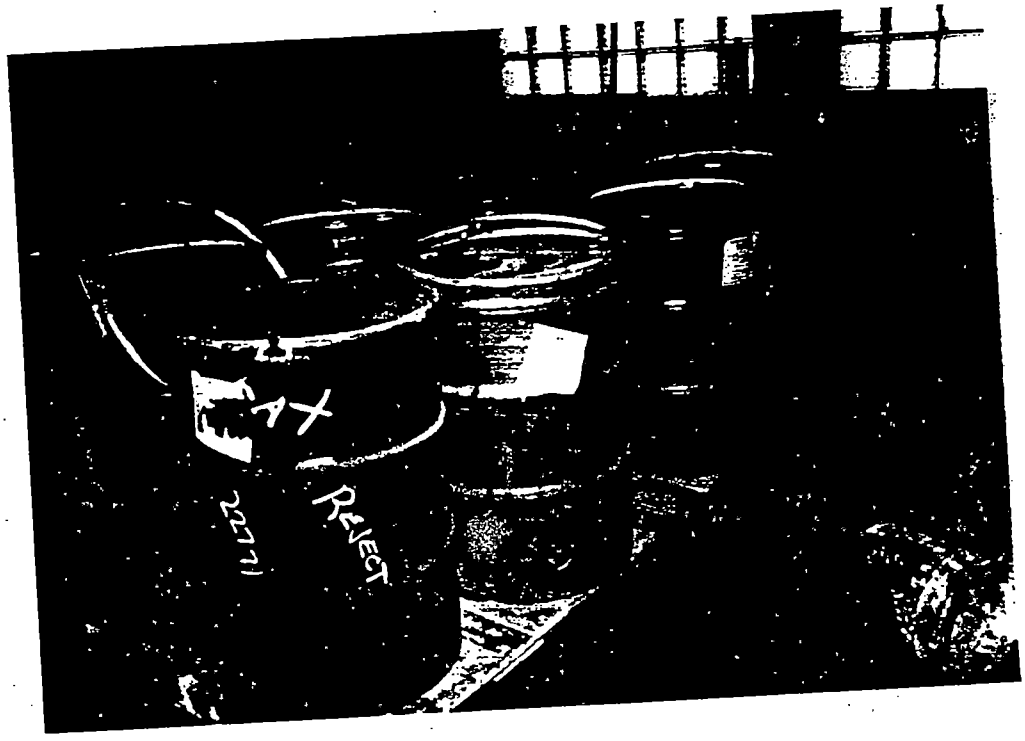
SHERWIN-WILLIAMS
CHICAGO, ILLINOIS

UNLABELED CONTAINERS
AT THE RCRA ACCUMULATION AREA

SHERWIN-WILLIAMS
CHICAGO, ILLINOIS

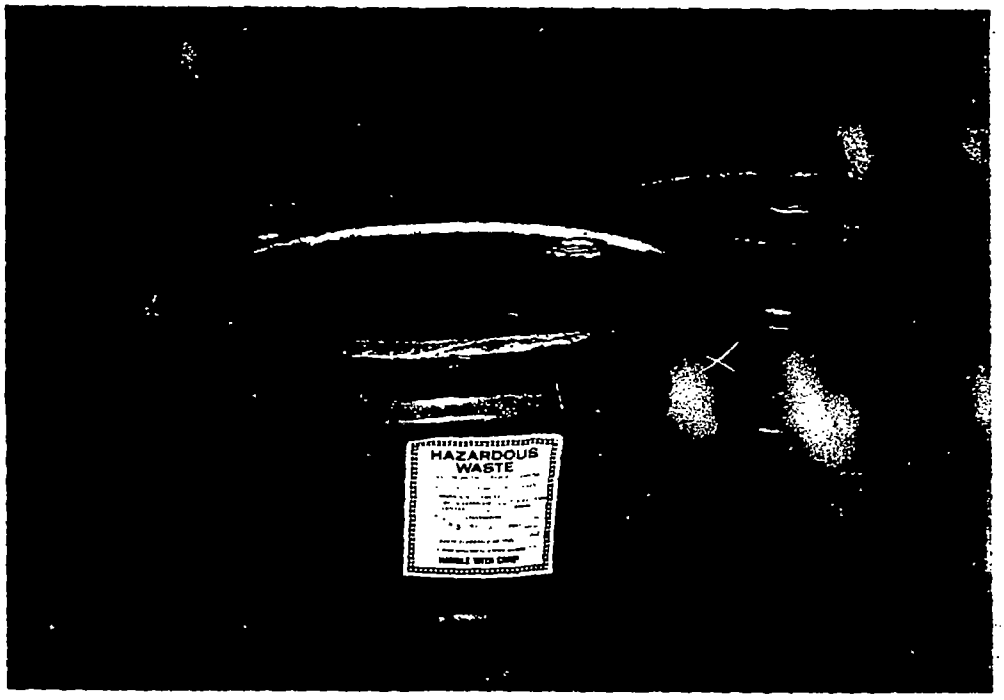
DRUMS OF HAZARDOUS WASTE STORED NEXT TO BUILDING 440 AND OUTSIDE OF THE FACILITY'S RCRA ACCUMULATION AREA (SEE ATTACHED MAP)

SHERWIN-WILLIAMS
CHICAGO, ILLINOIS



CONTAINERIZED DRUMS OF HAZARDOUS WASTE
STORED INSIDE BUILDING 440 AND OUTSIDE
OF THE FACILITY'S RCRA ACCUMULATION AREA

SHERWIN-WILLIAMS
CHICAGO, ILLINOIS



CONTAINERIZED DRUMS OF HAZARDOUS WASTE
STORED INSIDE BUILDING 440 AND OUTSIDE
OF THE FACILITY'S RCRA ACCUMULATION AREA

SHERWIN-WILLIAMS
CHICAGO, ILLINOIS

OPEN CONTAINERS OF HAZARDOUS WASTES
INSIDE BUILDING 440 AND OUTSIDE
OF THE FACILITY'S RCRA ACCUMULATION AREA

Section 725.132	Internal Communication. The hazardous waste accumulation area is in an open area which is not serviced by a telephone or other communication device. There are no alarms on site, no fire extinguishers or spill prevention equipment (see attached photographs).
Section 725.133	Testing and maintenance of equipment. Lacking at site.
Section 725.134	Access to communications or alarm systems. Facility personnel must go to an entrance gate (approximately 300 feet away) to notify security personnel in the event of an emergency.

In addition to the deficiencies observed at the facility's Hazardous Waste Accumulation Area, other deficiencies were observed during the inspection. These include:

LOCATION	COMMENTS
Building 200	A room contained two 55 gallon drums of empty (several ounces) containers and one 55 gallon drum of waste paints. The waste paint drum had no hazardous waste labels, accumulation dates and was stored open.
Building 220	A process control Lab had one hazardous waste drum without a Hazardous Waste Label affixed. Also, there wasn't any accumulation dates observed.
Building 220	Another 55 gallon drum was observed to have written on its side "Waste Sludge Dump". No other labels were affixed. No accumulation dates were written on the drum.
Building 197	Another 55 gallon drum located on the second floor contained wastes, however, it did not have a hazardous waste label, accumulation date and it was stored open.
Building 220	One 55 gallon drum of Hazardous Waste located on the 3rd floor had no hazardous waste labels, accumulation dates and no cover.
Building 197	One 55 gallon drum of Hazardous Waste located on the 3rd floor had no hazardous waste labels, accumulation date and cover.

Building 197	One 55 gallon drum of Hazardous Waste located on the 1st floor had no hazardous waste labels, accumulation dates.
Building 280	One 55 gallon drum of Hazardous-Waste had no labels or accumulation dates.
Strudel Center	3rd floor testing Lab had a waste container without a label or accumulation date.
Resin Building	Outside of the resin manufacturing buildings were approximately 50 drums in storage. It was undetermined if the drums contained wastes or reusable materials. The drums lacked any dates, however, based upon their condition, they may have been stored their for months.
Building 28	This central store house had several drums of returned paints. As to date no determination has been made whether these paints can be resold, reused or declared a waste. No dates were affixed to the drums.
All Areas	Throughout the week long inspection it was apparent that the facility accumulates hundreds of 55 gallon drums. Many of these drums are unlabeled, although they contain various liquids and solids. Since many of these drums have been accumulating for months (or perhaps years), operating personnel are uncertain as to their contents.

OPERATING RECORDS

Mr. Rob Martin prepares the facility's Annual RCRA Generator Report. This report is based on the summary of hazardous waste shipping manifests prepared during the preceding year. Although, Mr. Martin processes shipping manifests for the Chemical Coatings Division, he does not prepare manifests or manage wastes generated at the Resin Manufacturing Area or at any other manufacturing divisions on site. Subsequently, there is a lack of a central tracking system of offsite shipments by Sherwin-Williams. In the event of any discrepancies on any shipping manifest or if a shipping manifest is not returned in a timely manner, Mr. Martin would not be aware of this problem.

Moreover, since Sherwin-Williams lacks a central hazardous wastes manager responsible for all Hazardous Waste activities, RCRA operating deficiencies will most likely continue. Currently, each division at Sherwin-Williams accumulates waste in drums in their most convenient manufacturing locations. It was uncertain during the inspection that such satellite accumulation areas are clearly defined or that simply various operators haphazardly leave hazardous waste drums anywhere on site. Thus, it was not evident that the drums of hazardous wastes generated

on site were actually under the control of an operator. Apparently it is common practice to store waste drums with chemical supply drums used in manufacturing paints or resins. Also, it was uncertain that the transfer of hazardous wastes from the point of generation to the hazardous waste accumulation area is completed in a timely manner (less than 3 days). This was evident by the lack of accumulation dates on hazardous waste drums and by the placement of labeled hazardous waste drums outside the designated hazardous waste accumulation area.

Directly east of the accumulation area (approximately 200 feet) the U.S. EPA inspection team located several drums of hazardous wastes stored inside and outside of Building 440 (see attached photographs). This area also stores particulate dust (Sherwin-Williams claims that the dust is not a hazardous waste since it is reused in paint manufacturing) along with other drums which are not labeled. These hazardous waste drums must be placed within the designated hazardous waste accumulation area.

TRAINING PROGRAM

Sherwin-Williams does have a documented training program on site. The Hazardous Waste Training Manual for Sherwin-Williams plant personnel was presented at the time of the inspection. A copy of this manual is contained within the Appendix of this report. The last revision of the training program occurred in August 1989.

Although, the training program at Sherwin-Williams is well documented, there appears to be a lack of commitment by plant employees to follow the training provided. This is based upon the numerous drums of unlabeled and opened hazardous waste drums located throughout the facility.

1991 U.S. EPA Inspection

On February 20, 1991, Mr. Ken Burch, Chemical Engineer with the U.S. EPA office of UST/LUST and Mr. Gerald Golubski, Environmental Engineer with the Agency's Environmental Sciences Division - Central District Office revisited Sherwin-Williams. Mr. Burch was interested in the facility's underground storage tank program (see underground storage tank section of this report). However, the visit was also to gather additional information on the RCRA program as managed by Sherwin-Williams personnel.

In summary, several RCRA deficiencies were again observed at this time. Namely;

1. ne approximately 200 drums of hazardous wastes which were being ed within the facility's accumulation area, at least one-forth of the drums lacked accumulation dates.

2. Approximately, twenty drums of hazardous wastes had accumulation fill dates in October and early November 1990. Thus, the storage of wastes beyond 90 days was apparent.

3. Hazardous waste drums were again stored within Building 440 and along the side of this abandoned structure. This building is not designated as a RCRA accumulation area.

4. At the RCRA accumulation area, there were again several unlabeled drums stored next to the hazardous waste drums.

Manifests

A review of Sherwin-Williams 1990 and 1991 RCRA manifests were also reviewed at this time. As noted in the text of this report each division within the company processes their own separate offsite shipments of RCRA wastes. The returned copies are eventually forwarded to Mr. Robert Martin, the environmental service's director. Upon examining copies of these shipping manifests it was apparent that numerous shipments are made each month. It is not readily apparent if each division is storing wastes beyond 90 days based upon the large number of shipments made on a monthly basis. In summary, each manifest had appropriate signatures and descriptions of wastes. Land Ban notifications were also copied and attached to each manifest when required.

V. CLEAN WATER ACT

Sherwin-Williams does not have a direct discharge to a navigable waterway. Instead all discharges flows through their wastewater treatment system (API separator) to a sewer line located along Champlain Avenue (See Figure 4). That sewer line is part of the Metropolitan Water Reclamation District of Greater Chicago. Prior to June 8, 1988 Sherwin-Williams and PMC Specialties shared the same pretreatment facilities and discharged to a common outfall. As witnessed by this inspector, this outfall is no longer active. It is completely sealed. There now appears to be a complete separation of effluent discharges between the two companies.

Permit Application

Soon after the separation of the sewered discharges between Sherwin-Williams and PMC Specialties a new estimated flow from the paint manufacturer was submitted to the Metropolitan Water Reclamation District of Greater Chicago (formally the Metropolitan Sanitary District of Greater Chicago). These flows are:

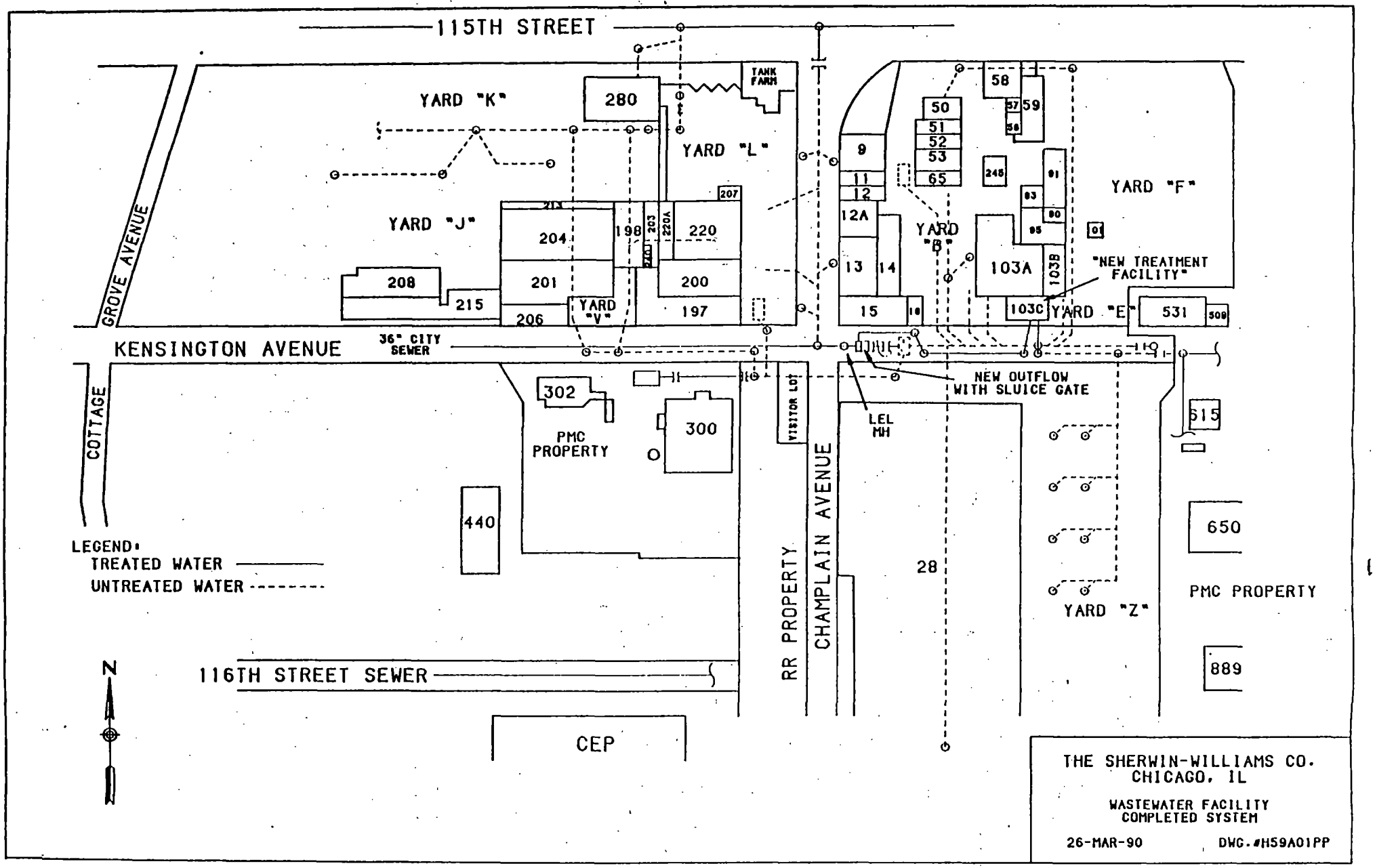
	Average	Maximum
Total Plant Flow (gallons/day)	661,850	777,800
Thermo Setting/Acrylic Resin	140,308	142,300
Paint Manufacturing	312,034	460,210
Boiler	72,300	87,200
Cooling Water	117,208	164,082
Sanitary Waste	20,000	24,000

Figure 4 details the most accurate presentation of effluent flows as known by Sherwin-Williams. The discharges presented were actually measured in the field while preparing the application. Currently, there are no permanently installed flow meters at each individual process line.

In addition, on February 6, 1989 a compliance schedule form (RD-112) was completed by Sherwin-Williams detailing a proposed schedule in which [illegible]mpany would meet the districts categorical standards.

[illegible]le was presented as follows:

		Commencement Date	Completion Date
1.	Installation of new treatment system for Ph control and repiping of plant effluent	15 Mar 1989	1 Oct 1989
2.	Resample to determine if in compliance		15 Oct 1989
3.	If not in compliance internal investigation to determine source of pollutants		1 Dec 1989
4.	Determine options available for treatment of pollutants		15 Jan 1990
5.	Cost effective analysis of treatment options		15 Jan 1990


115TH STREET
GROVE AVENUE
YARD "K"
280
TANK FARM
YARD "L"
YARD "J"
204
198
203
220A
220
207
208
215
201
206
YARD "V"
200
197
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11
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12A
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59
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248
91
93
90
95
01
YARD "B"
103A
103B
103C
"NEW TREATMENT FACILITY"
YARD "F"
YARD "E"
531
509
KENSINGTON AVENUE
36" CITY SEWER
COTTAGE
302
PMC PROPERTY
300
VISITOR LOT
NEW OUTFLOW WITH SLUICE GATE
LEL MH
515
440
RR PROPERTY
CHAMPLAIN AVENUE
28
650
PMC PROPERTY
YARD "Z"
889
LEGEND:
TREATED WATER
UNTREATED WATER
N
116TH STREET SEWER
CEP
THE SHERWIN-WILLIAMS CO.
CHICAGO, IL
WASTEWATER FACILITY
COMPLETED SYSTEM
26-MAR-90
DWG.#H59A01PP

6. Procure quotes, purchase and installation of treatment equipment	1 Mar 1990
7. Resample for compliance	1 Sept 1990

Baseline Monitoring Report

A baseline monitoring report (RD-111) was also submitted by Sherwin-Williams at this same time (February 6, 1989).

Compliance History

In April 1989, the Metropolitan Sanitary District sampled Sherwin-Williams final outfall and determined that the paint manufacturer had violated Appendix B of the Sewage and Waste Control Ordinance. Namely, they violated the effluent concentration limit for fats, oils & greases (FOG) and for lead at Outfall 1A.

Sampling Date	Parameter	Concentration	Categorical Limit
April 14, 1989	FOG	699 mg/l	250 mg/l
April 14, 1989	Lead	47 mg/l	0.359 mg/l
April 17, 1989	Lead	2.76 mg/l	0.359 mg/l

A hearing was planned and the Company was ordered to present a plan and schedule in order to return to compliance on July 7, 1989.

1989 Organic Analysis on Effluent Samples

During 1989 Environmental Services of Oak Creek, Wisconsin was contracted to analyze effluent samples from various discharges on Sherwin-Williams property. On June 15, 1989, the following compounds were detected in these effluent discharges (ug/l):

Compound	Paint Mfg.	Resin Mfg.	Steudel
Chloroform	9.4	8.3	--
Acetone	27	49	--
Methylene Chloride	7.0	--	48
Benzene	--	5.0	--
Toluene	--	140.0	--

On October 26, 1989 an effluent sample was obtained at Sherwin-Williams Water/VOC splitter box. That sample was shown to contain methylene chloride (23 ug/l), chloroform (9.9 ug/l), and acetone (490 ug/l). On January 9, 1990 another effluent sample from Sherwin-Williams main outfall - Station 1A was shown to contain methylene chloride (26 ug/l), toluene (87 ug/l), ethylbenzene (5400 ug/l), and acetone (57 ug/l). This same outfall was resampled on February 5, 1990. That effluent sample was again analyzed by Environmental Services and found to contain methylene chloride (160 ug/l), benzene (6.8 ug/l), ethylbenzene (460 ug/l), toluene (25 ug/l), and acetone (100 ug/l).

Fats, Oils & Greases Exceedances

Beginning on November 24, 1989, and continuing for several months the Water Reclamation District routinely sampled the effluent from Sherwin-Williams. A history of Fats, Oils & Greases exceedances was documented.

Sampling Date	Concentration (mg/l)
Nov. 24, 1989	24,073
Dec. 26, 1989	654
Dec. 28, 1989	12,422
Jan. 2, 1990	33,321
Jan. 8, 1990	29,824
Jan. 18, 1990	446
Jan. 19, 1990	10,524
Jan. 22, 1990	4,071
Jan. 24, 1990	4,259
Feb. 1, 1990	43,708
Feb. 2, 1990	11,974
Feb. 5, 1990	18,805
Feb. 8, 1990	620
Feb. 14, 1990	14,974
Feb. 15, 1990	3,802

The districts limit is 250 mg/l.

During 1990 Sherwin-Williams was also submitting Oil & Grease samples to their contract Lab. Analytical results indicated that the Oil & Grease concentrations varied from < 2 mg/l to 66 mg/l. However, our U.S. EPA inspection team noted that Sherwin-Williams personnel were using an improper sampling technique. Essentially, each water sample was transferred from one container which was dipped into the discharge stream to a glass shipping container. This is an unacceptable methodology as per STANDARD METHODS. Also, it was discovered that the glass containers submitted by Sherwin-Williams lacked an acid preservative. Thus, any analysis reported by the contract Lab must be regarded as questionable. These deficiencies were reported to Mr. Rob Martin and to the contract lab at the time of our inspection.

1990 VOC Analysis

Weston-Gulf Coast Laboratories, Inc. was contracted to provide analytical services starting in 1990. The results of the testing on effluent samples by this Company are as follows:

Analytical Results on Effluent Samples
Sherwin-Williams
Chicago, Illinois

Sampling Date: February 5, 1990

Compound	Concentration (ug/l)
Acrylonitrile	90
Methylene Chloride	400
Acetone	370
Ethylbenzene	500
Xylene (Total)	3000

Sampling Date: March 7, 1990

Compound	Concentration (ug/l)
Methylene Chloride	14
Acetone	42
Chloroform	5
1,1,1 Trichloroethane	40
Bromodichloromethane	3
Toluene	13
Chlorobenzene	4
Ethylbenzene	30
Xylene (Total)	520
Dichlorodifluoromethane	16
Acrylonitrile	9

Sampling Date: April 3, 1990

Compound	Concentration (ug/l)
Acrolein	8
Acrylonitrile	19
Methylene Chloride	20
Acetone	340
Chloroform	2
Toluene	94
Chlorobenzene	49
Ethylbenzene	780
Xylene (Total)	4400

Sampling Date: May 8, 1990

Compound	Concentration (ug/l)
Methylene Chloride	3200
Acetone	1200
Chloroform	5
Toluene	180
Chlorobenzene	13
Ethylbenzene	90
Xylene (Total)	4500

Sampling Date: June 4, 1990

Compound	Concentration (ug/l)
Acrolein	3
Acrylonitrile	94
Methylene Chloride	210
Acetone	440
Chloroform	5
Toluene	480
Chlorobenzene	27
Xylene (Total)	4300
Ethylbenzene	480

Sampling Date: July 9, 1990

Compound	Concentration (ug/l)
Acetone	1800
Chloroform	8
Bromodichloromethane	4
Benzene	6
Toluene	35
Chlorobenzene	19
Ethylbenzene	94
Xylene (Total)	830

Show Cause Hearing (March 30, 1990)

A recommendation for a show cause hearing was made on March 14, 1990. This hearing was scheduled due to (1) On March 23, 1989 Sherwin-Williams was issued a notice of noncompliance for discharging an effluent with excessive concentrations of lead, (2) on June 27, 1989 the company was issued notice of violation for discharging an effluent with excessive concentrations of fats, oils and greases (FOG) and lead (that violation was later amended to include violations for copper, iron, nickel, and zinc), and (3) that a conciliation between Sherwin-Williams and the District had broken down.

However, a conciliation meeting was again scheduled for March 30, 1990. In addition, the District was also concern with the elevated organics concentrations recently found in the final effluent. Namely, the 3,000 ug/l of xylenes reported by Weston-Gulf Coast Labs in February 1990 and with the District's own analysis on a sample taken on January 9, 1990. The District's sample reportedly contained meta xylene (16,168 ug/l), ortho and/or para xylene (12,507 ug/l) as well as 2-methyl-1-propanol (3,050 ug/l).

As a result of the meeting, Sherwin-Williams signed an agreement in which they would make an overall comprehensive effort to eliminate VOC discharges to the sewer system by sending reaction water to a separation tank. After separation, that waste water will be used as a caustic wash solution, which is ultimately hauled off site as part of Sherwin-Williams hazardous waste program. Any unused wastewater will pass through an activated carbon filtration system prior to discharge. A pilot plant study to evaluate such a system was scheduled to begin by August 1990.

In addition, a new clarifier would be operating by April 30, 1990. Finally a new separation tank would be installed by May 30, 1990. Progress reports are to be made monthly by Sherwin-Williams.

Show Cause Hearing (May 2, 1990)

Pursuant to the show cause hearing on May 2, 1990 as conducted by Mr. Benn J. Leland P.E. on behalf of the District's Board of Commissioners, Sherwin-Williams was required.

1. To comply with Appendix B of the Districts Sewage and Waste Control Ordinance by July 9, 1990.

2. Sample their discharge on a 24-hour composite basis each week for common metals as well as take a weekly grab sample for fats, oils & greases. The analytical results are to be forwarded to the District for review.

3. The Company (Sherwin-Williams) shall prepare and submit to the District an acceptable Baseline Monitoring Report by August 6, 1990.

Subsequently, an Order was entered by the District's Board of Commissioners on June 7, 1990 addressing these requirements as presented in the hearing of May 2, 1990.

DISTRICT'S CONCERNS ON VOC'S IN FINAL EFFLUENT

In response to the VOC analytical results on effluent wastewaters at Sherwin-Williams, the District ordered Sherwin-Williams on June 29, 1990 to conduct an investigation into the causes of the increased concentrations of dichloromethane and acetone found in your discharge.

This letter was prepared following a review of the following reported analytical results (ug/l) during 1990 at Outfall 1A.

	Reporting Period			
VOC Name	January	March	April	May
Dichloromethane	400	14	20	3200
Toluene	ND	13	94	180
Chlorobenzene	ND	ND	49	13
Ethylbenzene	500	30	780	90
Acetone	370	42	340	1200

ND = None Detected

New Baseline Monitoring Report

On August 6, 1990 Sherwin-Williams submitted a New Baseline Monitoring Report (as required) to the District. The total plant flow (gallons/day), paint manufacturing flow as well as other discharge points were reportedly reduced as follows.

	Average	Maximum
Total Plant Flow (gal./day)	546,267	743,100
Resin Plant Flow (gal./day)	284,142	362,450
Paint Facility (gal./day)	134,284	197,477
Boiler Blowdown (gal./day)	72,000	87,200
Cooling Water (gal./day)	46,627	78,019
Sanitary Waste (gal./day)	3,575	

ORGANIC ANALYTICAL ANALYSIS

Environmental Monitoring and Technologies Inc., 8100 North Austin Avenue, Morton Grove, Illinois analyzed final effluent samples at Sherwin-Williams in July 1990. The results of the analysis indicated the following organics were present (ug/l):

Compound	July 9-10th	July 10-11th	July 11-12	July 13-14	July 16-17
Toluene	7.0	1.0	16,100*	12	286
Chloroform		0.8		3	
1,3 Dichlorobenzene			45.0		
1,4 Dichlorobenzene			95.0		
1,2 Dichlorobenzene			1810.	70	90

Compound	July 9-10th	July 10-11th	July 11-12	July 13-14	July 16-17
1,2,4 Trichlorobenzene			2.5	0.3	
Naphthalene			2.0		
Benzene			3.4	1	16
Ethylbenzene			37	6	740
Chlorobenzene				5	31
Bis (2-ethylhexyl) phthalate					7

* According to Mr. Robert Martin, the environmental division director explained that this anomaly high concentration may be due to a rare failure of the solvent/water separator within the resin plant. In order to alleviate this chance occurrence, Sherwin-Williams no longer discharges this water to their sewer system. Instead these waters are now used for making a caustic solution in the process of paint manufacturing. Any waste solutions generated by this process is manifested offsite and is regulated under their hazardous waste program.

It appears that Sherwin-Williams was still discharging a final effluent containing toluene, ethylbenzene, benzene and a variety of chlorinated hydrocarbons during this sampling period.

Metals Analytical Analysis

In addition to sampling for organics, several 24 hour composite samples were analyzed for Lead, Zinc, and Cyanide. The following results were reported:

Sample Description: 24 hour FPC after treatment

Date	Lead	Zinc	Cyanide
7/9-10	0.02	0.14	<0.5
7/10-11	0.01	0.14	<0.5
7/11-12	0.01	0.15	<0.5
7/12-13	0.03	0.14	<0.5
7/13-14	0.02	0.17	<0.5
7/16-17	0.01	0.16	<0.5

All results expressed as ppm unless otherwise indicated.

The Districts categorical limits for Lead is 0.359 mg/l, for Zinc is 1.358 mg/l, and for Cyanide is 0.624 mg/l.

Based upon the presence of organics in the final effluent Sherwin-Williams proposed that further testing be conducted as soon as possible and the installation of additional pretreatment units within several months if needed.

VI. SPILL PREVENTION & COUNTERMEASURES PLAN

The Plan

Sherwin-Williams current chemical emergency contingency plan was last updated in December 1989. That document replaced the facility's 1984 Spill Prevention & Countermeasures Plan and the December 1987 Chemical Emergency Contingency Plan. The 1984 plan was certified by Mr. Fred Krikau, P.E. (Illinois 062-24544). The newer plans have not been certified by a registered professional engineer (P.E.). The new plan was prepared by Mr. Rob Martin who was designated as the emergency coordinator (See Appendix). Mr. Martin is not a registered professional engineer.

Tank Inventory

A detailed list of tanks above and below ground are detailed within the plan (see Table III). The above ground tanks contain a variety of chemicals commonly used in the manufacturing of paints. They include xylene, naphtha, toluene, styrene, MIBK, aromatic hydrocarbons, oils, alcohols, acetates, etc.

As explained by Mr. Rob Martin, Director of Environmental Services, they plan to remove several above ground tanks and all the underground tanks. Tentatively Tanks #610, #612, #613, #614, #616, #617, and #618 are scheduled to be removed within one year. Tank No. 1 (gasoline tank) was removed on February 20, 1991.

Tank Farm A

One serious deficiency was noted by the inspection team during the site visit at Tank Farm A (located along 115th Street). Essentially, several thousand gallons of flammable solvents are located within a six foot high containment wall which extends from Building #9. Although, the containment volumn was sufficient to meet the SPCC regulations, an open sewer was located "INSIDE" the containment area. The sewer lacked any cover what-so-ever. Also, the walls of the sewer were severely weathered. Moreover, there was an active flow of waters passing through the bottom of the sewer due to recent precipitation events. It is apparent that in the event of a release from any tank located in the tank farm, the release would not be contained.

This tank farm areas was again revisited on February 20, 1991. At that time it was witnessed that a wooden cover was placed over the top of the sewer. It appears that no repairs to the sewer were made. It is doubtful that in the event of a release a spill would be contained.

Incomplete List

According to Mr. Rob Martin, the Chemical Emergency Contingency Plan needs to be updated in 1990. This is due in part to the planned removal of both aboveground and underground tanks. Also, it was learned during the inspection one 4,000 gallon caustic tank (a parts washer) was inadvertently not listed in the tank inventory.

TABLE III

Flammable - Volatile - Explosive - Corrosive Material

Specific Name	Method of Storage	Quantity/gal	Reportable Spill Quantity/lb
Xylene	Tank 602 ABV	25,000	1,000
Naphtha 50 Flash	Tank 604 ABV	25,000	100
Toluene	Tank 605 ABV	25,000	1,000
Styrene	Tank 608 ABV	15,000	1,000
MIBK	Tank 609 ABV	15,000	5,000
Highly Aromatic Naphtha	Tank 620 ABV	15,000	---
Di-Isobutyl Phthalate	Tank 621 ABv	15,000	---
Cyclohexanone	Tank 622 ABV	15,000	5,000
Mineral Spirits 100 Flash	Tank 623 ABV	15,000	---
Styrene	Tank 624 ABV	15,000	100
N-Butyl Acetate	Tank 625 ABV	15,000	5,000
Aromatic Naphtha	Tank 638 ABV	15,000	---
Methyl-Ethyl Ketone	Tank 639 ABV	15,000	5,000
Butyl Cellosolve	Tank 640 ABV	15,000	---
Styrene	Tank 641 ABV	15,000	1,000
Minerals Spirits	Tank 644 ABV	100,000	---
Dehydrated Castor Oil	Tank 222 ABV	24,000	---
Soya Oil Alk. Ref.	Tank 643 ABV	60,000	---
Alk. Refined Linseed	Tank 691 ABV	19,000	---
TMPP	Tank 697 ABV	16,000	---
Butyl Alcohol	Tank 610 U	8,000	5,000
Lacquer Diluent	Tank 612 U	8,000	---
2-Ethoxy Ethyl Acetate	Tank 613 U	8,000	---
Isobutyl Alcohol	Tank 614 U	8,000	5,000
Methyl Methacrylate	Tank 616 U	8,000	1,000
Resinous Polyol	Tank 617 U	8,000	---
Isopropyl Acetate	Tank 618 U	8,000	---
Raw Tung Oil	Tank 226 ABV	24,000	---
Dehydrated Castor Oil	Tank 227 ABV	25,000	---
Copal Type Resin	Tank 230 ABV	25,000	---
Empty	Tank 231 ABV	10,000	---
Raw Castor Oil	Tank 232 ABV	10,000	---
Blown Castor Oil	Tank 249 & 255 ABV	10,000	---
Ortho Cresol Soln	Tank 1 ABV	1,000	---
Linseed Copol Mod. Soya Alk.	Tank 2 ABV	5,000	1,000
Linseed - Non-Break	Tank 3 & 4 ABV	5,000	---
Glycerine	Tank 1,2,3 B U	5,000	---
Tall Oil	Tank 4 & 5 B U	5,000	---
Phthalic Anhydride	Tank 142 & 143 ABV	8,000	1,000
12-Carbon Ester Alcohol	Tank 15002 ABV(CEP)	15,000	---
2-Butoxy Ethanol-Butyl Cellslv	Tank 7502 ABV (CEP)	7,500	---
2 - Butoxyethoxyethanol	Tank 7503 ABV (CEP)	7,500	---
Dirty Solvent	Tank 711 ABV	700	---
Dirty Solvent	Tank 698 ABV	15,000	---
Dirty Solvent	Tank 86,87,88 ABV	5,000	---
Reclaimed Solvent	Tank 690 & 699 ABV	15,000	1,000
Spent Solvent	Tank 85 & 688 ABV	15,000/5,000	1,000

Also, it was suggested during the inspection that the Plan also contain the calculated holding capacity of diking around each tank located on the premises. This information would be helpful in order to assure that sufficient diking has been adequately provided. It should be noted that except for the serious deficiency at Tank Farm A there appeared to be adequate diking around Tank Farm L and within production buildings. It is unlikely that if a spill occurred within a production building that a release would occur beyond the building itself.

Abandoned Tanks

Situated south of the manufacturing area and located on PMC property are four abandoned 400,000 gallons above ground storage tanks. The inspection team noted that each tank was empty and that earthen diking surrounded each tank. It is believed that the tanks were taken out of service at least a decade ago. It is uncertain what each tank held during its history, however, Mr. Rob Martin believes that the tanks are all in good condition. He stated that PMC may in fact return these to service.

VII. UNDERGROUND STORAGE TANKS

On January 1, 1986 Sherwin-Williams filled a notification for underground storage tanks at their facility. In summary, the tanks were described as follows:

Tank #	Age (yrs.)	Capacity (gal.)	Internal Protection	External Protection	Piping	Contents
610	12	8,000	None	Painted	Bare Steel	Butyl Alc.
611	12	8,000	None	Painted	Bare Steel	Xylene
612	12	8,000	None	Painted	Bare Steel	Lacquer
613	12	8,000	None	Painted	Bare Steel	Isopropyl Alc.
614	12	8,000	None	Painted	Bare Steel	Isobutly Alc.
616	12	8,000	None	Painted	Bare Steel	Methacrylat
617	12	8,000	None	Painted	Bare Steel	Isobutyrate
618	12	8,000	None	Painted	Bare Steel	Isopropyl Acetate
#1	5	1,000	None	Painted	Galvanized	Gasoline

According to Mr. Rob Martin, all tanks are to be pulled from the ground within a year or two. However, a final determination has not been made on this change during the time of this August 1990 inspection. Sherwin-Williams wants to remove these tanks as soon as possible before the latest UST tank regulations become effective (December 1992).

Gasoline Tank Removed

On February 20, 1991 the 1,000 gallon underground gasoline tank was removed by OHM Corporation of Romeoville, Illinois. As witnessed by the Chicago Fire Department representative (Lt. Davis), the integrity of the tank appeared to be good. No visible leaks, cracks or line failures were indicated. Once the tank was pulled no petroleum odors were apparent. No visible discoloration of the soils were noted. Soil samples were taken on this day in order to confirm that no leaks had occurred. The application for removing the tank is provided within Appendix XIII of this report.

VIII. TSCA - PCB

On May 27, 1981 representatives of the U.S. EPA conducted an inspection at Sherwin-Williams. That inspection was made in order to determine how the company was handling, storing, and disposing of PCB related items. Hydraulic fluids, heat transfer systems, and electrical devices were inspected. The company was found to be deficient in lacking proper documentation on the disposal of PCB capacitors, inadequate curbing for their PCB storage area, insufficient inspection records, and operating records. Also noted, was the lack of dates on PCB related items in storage as well as some PCB related items (capacitors) which were not labeled. Pursuant to these aforementioned violations Sherwin-Williams corrected the deficiencies and paid a fine of $2,000.00. A copy of the inspection report is contained within the Appendix of this report.

Current Status

On November 14, 1990 representatives of the U.S. EPA conducted another inspection at Sherwin-Williams. Essentially, two violations were observed at that time. These include:

1. One PCB transformer was not registered with the local fire department until January 30, 1986. This is a violation of 40 CFR 761.180(a)(2) under improper use.

2. Annual documents for the years 1978 to 1989 were incomplete, and this violates 40 CFR 761.180(a)(2) under improper recordkeeping.

At the present time Sherwin-Williams has sixteen PCB electrical capacitors (approximately 1 1/2 gallons of fluids each) and one electrical transformers on site. The transformer is believed to contain 350 ppm of PCB's within its fluid.

TSCA - NEW CHEMICALS

Representatives of the U.S. EPA conducted an inspection at Sherwin-Williams on March 28, 1989 in order to determine compliance with Section 5, 8, and 13 of the Toxic Substances Control Act. In summary, no violations were apparent from the inspection.

For further information concerning that report please contact ESD's Pesticides and Toxic Substances Branch. However, the contents of that report are treated as Confidential Business Information (CBI).

Illinois Environmental Protection Agency · 1701 First Avenue, Maywood, IL 60153

DATE: August 15, 1989 Date of Inspection: June 15, 1989

TO: Sy Levine Last Insp. Date: April 5, 1989

FROM: Harish Narayen Region/District: 104

Facility: Sherwin Williams Co. I.D. #: 031 600 AHO

Address: 11541 S. Champlain, Chicago 60628

Contact/Title: Robert Martin/Env. Affairs Phone: 821-3000
Richard Martin/Coating Plant
Bill Lukes/Supt. Resin Plant

1.0 Product-Process Description

Facility manufactures resins and paints. On an average 9 to 11 million gallons of paint manufactured at this plant. The facility is divided into three distinct operations as follows:

1.01 Paint manufacturing plant. In this plant the resin and varnish manufactured in the resin plant is mixed with pigments and solvents to manufacture paint. The operations involve mixing of resin, pigment and solvents in mills, mixers and thin tanks, shade tanks for colorations and storing in product storage tanks. The following sources are included in the permit for paint manufacturing plant.

1.011 Paint Department Product Tanks

Nominal Capacity	Number of Tanks	Total Capacity by Size
300 Gal.	12	3,600 Gal.
500 Gal.	13	6,500 Gal.
600 Gal.	1	600 Gal.
700 Gal.	10	7,000 Gal.
1,000 Gal.	30	30,000 Gal.
1,500 Gal.	34	51,000 Gal.
2,000 Gal.	34	68,000 Gal.
3,000 Gal	13	39,000 Gal.
4,000 Gal.	8	32,000 Gal.
7,000 Gal.	3	21,000 Gal
	158	258,700 Gal.

1.012 S-W Batch Mills vented to dust collector

Mill Number	Working Capacity
S-3. S-5. S-6 baghouse	200 gallon
S-7	150 Gallon
SA-2, SA-3, SA-4	50 gallon

1.013 High Speed Dispersers vented to dust collector

Disperser Number	Maximum Capacity	Working Capacity
C-3	75 Gal.	35-75 Gal.
C-24	140 Gal.	60-140 Gal.
*C-7, C-8, C-14, C-15, C-16	500-514 Gal.	200-500 Gal.
C-1, C-2, C-5, C-6 C-17, C-18, C-20, C-22	575-600 Gal.	200-600 Gal.
C-19	821 Gal.	430-821 Gal.
C-21, C-23	1600 Gal.	500-1600 Gal.

*C-7, C-14 and C-15 serve as pre-mixers for Continuous Bead Mills.

High Speed Dispersers are also referred to as Cowles Mixers or Mills.

1.014 Continuous Bead Mills

Mill Number	Type	Capacity
SC-4	Sussmeyer Vertical	30 Gal.
SC-5	Sussmeyer Vertical	30 Gal.
SC-6	Sussmeyer Vertical	30 Gal.
SC-7	Sussmeyer Horizontal	120 Liter
SC-8	Sussmeyer Vertical	16 Gal.
SC-9	Coball	3.4 Liter
SC-11	Netsch Jon	33 Liter

1.015 Myers Mixers - vented to dust collector

Mixer Number	Nominal Volume	Working Capacity
MC-1	215 Gal.	60-165 Gal. (Portable)
MC-2	704 Gal.	225-600 Gal. (Fixed)

1.016 Paste Mixers - vented to dust collector

Mixer Number	Maximum Working Capacity
P-3	250 Gallon
P-4	250 Gallon
P-5	250 Gallon

1.017 Ball Mills

Mill Number	Size	Gross Capacity	Maximum Paste Volume
B-1	6'D x 8'L	1,639 Gal.	655 Gal.
B-3	6' x 8'	1,639 Gal.	655 Gal.
B-12	5' x 8'	1,639 Gal.	655 Gal.
B-4	5' x 6'	863 Gal.	345 Gal.
B-5	5' x 6'	863 Gal.	345 Gal.
B-6	5' x 6'	863 Gal.	345 Gal.
B-11	5' x 6'	863 Gal.	345 Gal.
B-7	4' x 5'	455 Gal.	182 Gal.
B-8	4' x 5'	455 Gal.	182 Gal.
B-9	21" x 38"	33 Gal.	16 Gal.

1.02 Chicago Coating/Emulsion Plant. In this plant only water base coatings are manufactured. The operations involve mixing, intermediate storing and filling. The following sources are included in the permit for Chicago coating/emulsion plant.

1.021 Eight Storage Silos for storing raw materials, including pigments and extenders. Each silo is equipped with its own baghouse dust collector located on top of the silo.

1.022 Four high speed mixers vented to baghouse dust collector.

1.023 Pneumatic transporting of raw material from the silos to feed bins controlled by baghouse dust collector.

1.024 Two gas fired boilers for space heating: 6.277 MMBTU capacity each.

1.025 The following storage tanks for miscellaneous material storage as follows:

a. 1-15,000 and 4-30,000 gal latex tanks.
b. 1-7500 and 1-15000 gal. propyl and ethylene glycol tanks.
c. 1-7500 gal. surfactant tank.
d. 1-7500 gal. and 1-15,000 gal. tanks for Trimethyl-pentadiene isobutyrate.
e. 3-6000 gal. polyglycol alkyds tanks.
f. 1-7500, 2-15000 and 9-2000 gals multipurpose tanks.

1.03 Resin/Varnish plant. In this plant the facility manufactures resin and varnish bases to be used in their paint manufacturing plant or sold to customers. The following sources are included in the permit for Resin/Varnish manufacturing plant.

1.031 STORAGE TANKS

Tank No.	Location	Capacity (Gallons)
70	Bldg.51-1	5,000
71	"	"
72	"	"
73	"	"
74	"	"
75	"	"
76	"	"
77	"	"
78	"	"
79	"	"
80	"	"
81	"	"
82	"	"
83	"	"
84	"	"
85	"	"
86	"	"
87	"	"
89	"	"
90	"	"
91	"	"
97	Bldg. 52-1	"
98	"	"
99	"	"

Tank No.	Location	Capacity (Gallons) --cont.
100	Bldg. 52-1	5,000
101	"	"
102	"	"
103	"	"
104	"	"
105	"	"
106	"	"
107	"	"
108	"	"
109	"	10,000
110	"	"
111	"	"
112	"	"
113	"	"
114	"	"
317-A	Bldg. 91-1	5,000
317-B	"	"
318-A	"	"
318-B	"	"
319-A	"	"
319-B	"	"
320-A	"	"
320-B	"	"
321-A	"	"
321-B	"	"
322-A	"	"
322-B	"	"
323-A	"	"
323-B	"	"
324-A	"	"
324-B	"	"
325-A	"	"
325-B	"	"
326	"	9100
327	"	"
328	"	"
329	"	"
330	"	"
331	"	"
332	"	"
333	"	"
335	"	"
336	"	"
337	"	"
338	"	"
339	"	"

340	Bldg 91.1	9100
341	"	"
342	"	"
343	"	"
344	"	"
345	"	"
346	"	"
347	"	"
357	"	11000
358	Bldg. 90-1	12507
359	"	"
360	"	"
361	"	"
362	"	11994
363	"	"
364	"	"
365	"	"
366	"	"
372	"	"
373	"	"
374	"	"
375	"	"
376	"	"
377	"	5,059
378	"	12,025
348-A	Bldg. 91-1	5,000
348-B	"	"
349-A	"	"
349-B	"	"
350-A	"	"
350-B	"	"
351	"	"
352-A	"	"
352-B	"	"
353	"	7,100
354	"	11,000
355	"	"
356	"	"
222	Bldg. 9-A	24,327
227	Bldg. 245-1	24,960
229	"	10,040
230	"	"
232	"	"
248	"	"
249	"	"
1	Bldg. 50-B	5,000
2	"	"
3	"	"
4	"	"
5	"	"
688	Yard A	10,361
689	"	51,200
691	"	"
696	"	15,800
697	"	13,500

Tank No.	Location	Capacity (Gallons - cont.
602	Bldg. 253-L	24,200
604	"	25,200
605	"	25,700
608	"	15,000
609	"	"
620	"	"
621	"	"
622	"	"
623	"	"
624	"	"
625	"	"
638	"	"
639	"	"
640	"	"
641	"	15,000
643	Yard A	58,857
644	Bldg. 253-L	102,731
610	Yard L	8,000
611	"	"
612	"	"
613	Yard L	8,000
614	"	"
616	"	"
617	"	"
618	"	"
142	Bldg. 50-4	7,000
143	Bldg. 53-4	8,826

1.032 Kettles and Reactors

Kettle or Reactor No.	Location	Capacity (Gallons)
K-1	Bldg. 50-3	3500
K-2	"	3500
K-6	"	1000
K-7	"	1000
K-8	"	1200
K-9	"	1500
R-1	Bldg. 65-3	5000
R-2	"	5000
R-3	"	1000
R-4	"	10000

1.033 Thinning and Prefilter Tanks

Tank No.	Location	Capacity (Gallons)
T-1	Bldg. 50-1	7,500
T-2	"	8,000
T-6	"	2,000
T-7	"	2,000
T-8	"	2,500
V-9	Bldg. 53-2	7,000
V-10	"	7,000
V-11	"	7,000
V-12	"	7,000
V-13	"	7,000

1.034 CONDENSERS

Condenser No. on Reactors & Kettles	Location	Surface Area (Ft^2)
HR-1 on R-1	Bldg 65-4	400
HR-2 on R-2	"	"
HR-3 on R-3	"	207
HR-4 on R-4	"	-
HT-9 on V-9	Bldg. 53-2	104.7
HT-10 on V-10	"	"
HT-11 on V-11	"	"
HT-12 on V-12	"	"
HT-13 on V-13	"	"
HK1 on K-1	Bldg. 50-4	400
HK2 on K-2	"	"
HK6 on K-6	"	250
HK7 on K-7	"	"
HK8 on K-8	"	"
HT-1 on T-1	Bldg. 50-1	250
HT-2 on T-2	"	400
HT-6 on T-6	"	90
HT-7 on T-7	"	"
HT-8 on T-8	"	"

1.035 RECEIVING TANKS

Tank No	Location	Capacity (Gallons)
R-1	Bldg. 65-3	100
R-2	"	100
R-3	"	60
R-4	"	-
K-1	Bldg. 50-3	50
K-2	"	60
K-6	"	50
K-7	"	30
K-8	"	50
K-9	"	100

1.036 MIXING TANKS

Tank No.	Location	Working Capacity (Gallons)
2	Bldg. 11-1	480
3	"	500
4	"	500
5	"	1250
6	"	1250
7	"	1250
8	"	160
9	"	160
12	"	500
30	"	1500
21	Bldg. 9-1	1800
22	"	1800
23	"	4000
24	"	4000
1	Bldg. 58-2	1000
2	"	1000
3	"	1000
4	"	1000
5	"	1000
6	"	1000
7	"	450
8	"	300
102	Bldg. 58-3	3000

1.037 WEIGH TANKS

Tank No.	Location	Capacity (Gallons)
1	Bldg. 50-4	1,000
3	"	1,500
4	"	500
V-1	Bldg.65-4	4,000
V-2	"	"
V-3	"	800

1.038 COMBUSTION EQUIPMENT FOR THE KETTLES

ITEM NO.	LOCATION	Nominal Firing Rate
CD-1	Bldg 48-2	2,000,000 BTU/hr
CD-2	Bldg 48-B	1,240,000 "
CD-6	Bldg 25	550,000 "
CD-7	Bldg 25	550,000 "
CD-8	Bldg 48-A	1,000,000 "

1.039 MISCELLANEOUS ITEMS

ITEM	LOCATION	SIZE OR CAPACITY
Glycol Scrubber GT-1	Bldg. 50-3	6' x 2'2" Dia.
Glycol Scrubber GT-8	Bldg. 50-3	9'6" x 1'6" Dia.
Resin Dust Collector	Bldg. 58-3	750 CFM
Eductor Kettle 1	Bldg. 50-4	6 x 6 Venturi
Hot Oil Expansion Tank	Ground Bldg. 48	250 Gallons
Hot Oil Dump Tank	"	600 Gallons
Heat Exchanger Kettle 1	Bldg. 50-2	300 Ft^2
Emergency Overflow Tank	Roof Bldg. 65	15,000 Gallons

2.0 Purpose of Inspection

6-15-89 and 4-5-89: Annual inspection pursuant to Workplan
3-11-88: Workplan and PM-10 inspection.

2.1 Compliance History

4-12-88: Letter from Robert Martin, Dir. Environmental Service, responding to Agency's CIL of 4-5-88.

4-11-88: Letter from James Jones, Engineering Coordinator, responding to Agency's CIL of 4-5-88.

4-5-88: CIL sent to the company for alleged violations of Section 201.143, 201.144 and 215.430 thru 215.438 as observed during 3-11-88 inspection.

1-9-87: Response from company to Agency's CIL of 12-30-86.
12-30-86: CIL to the company for Section 201.144 violation.
12-3-86: Inspection of the facility by E. Osowski.

NOTE: Prior to June/July of 1986 Sherwin Williams Co. also owned and operated sources currently owned by PMC specialists. Both PMC specialists and Sherwin Williams Co. are adjacent to each other. The PMC plant, previously owned by Sherwin Williams Co. and the current Sherwin Williams plant, had been in the past a source of odor nuisance in the area. The potential sources of odor nuisance were the creosol operations and paint mixing operations. There are no recent complaints received by the Agency.

2.2 Observations-Discussion Related to Inspection

6-15-89 Inspection by H. Narayen:
Mr. Robert Martin provided the necessary information during this inspection.

2.2 **Observations-Discussion Related to Inspection - continued**

Paint Plant:
The facility manufactures approximately 10 million gallons of solvent base paint per year. The various operating equipment are listed in Section 1.0 of this report. Except for dry raw material, all the raw materials fed to the various mills and tanks are pumped through pipelines. The intermediate products are also pumped through pipelines. All the mills are complately enclosed. All mixing tanks have covers in accordance with the Section 215.624 requirements. The facility is currently conducting equipment monitoring program to detect leaks from the paint manufacturing plant equipment, in accordance with Section 215.628 requirements.

Resin and Varnish Manufacturing
The facility manufactures a variety of resins. The manufacturing of resin is done in four reactors and six kettles. All the reactors and kettles have individual condensers for VOC emission control. The facility claims that the condensers are 97% efficient to control VOC emissions and the sources in the resin manufacturing department are in compliance with Section 215.966 requirements (letter from company dated July 20, 1989 attached).

The facility claims the uncontrolled VOC emissions from resin department are 497.7 TPY and controlled VOC emissions are 16.3 TPY. There were no apparent problems noticed from the reactors and kettles during this inspection.

4-5-89 Inspection by H. Narayen:
Mr. George Martin, Division Director of Engineering Design, conducted a tour of the plant. Mr. Robert C. Martin, who is the Director of Environmental Services, was admitted into the hospital due to ill health and could not provide the detailed information on plant production and emission data.

The company has instituted the leak test program almost a year ago as per Mr. G. Martin. The facility has rectified all the apparent violations noted during the March 11, 1988 inspection.

Another inspection of the facility will be scheduled at a later date to verify and update as necessary the production and emission data in the TAS and, also, the applicability and compliance with Section 215.620 and 215.960 will be determined..

3-11-88 Inspection by H. Narayen:
Mr. Dave Ohmke conducted a tour of the Resin plant. Due to excess product inventory the resin plant is currently operating 4 days a week. During this inspection the resin plant was not being operated. As per Mr. Ohmke, the operations at the resin plant remain the same since last inspections. The facility operates 24 hours per day while it is running. The plant will be back on full production schedule as soon as market conditions improve.

2.2 **Observations-Discussion Related to Inspection - continued**

Mr. Richard Martin conducted a tour of the paint manufacturing plant. This plant was also not in operation during this inspection. As again like the resin plant, the paint manufacturing plant was also affected by high product inventory and market conditions.

Mr. Jim Jones conducted a tour of the Chicago emulsion plant where only water base latex paint is manufactured. One of the four high speed mixers were in operation. The mixers which have TSP emission during raw material loading operations are vented to a baghouse dust collector. All the sources at the plant are well controlled. There are no solvents used at this plant and hence no VOC emissions. The facility has installed and is operating two gas fired boilers at this plant for space heating. The boilers are rated at a maximum firing capacity of 6.277 MMBTU each.

During the inspection the Company was requested to provide the necessary information on emission and stack parameters for each source of TSP emissions as part of the PM-10 study. The facility was requested to submit this information by April 15, 1988.

2.3 Summary of Meetings

N/A

2.4 Telephone Call Reports

N/A

3.0 **Emission Source Identification** [S-W Batch Mills all controlled by wheelabrator dust collection system: P No. 72100426]

Mill Number	Working Capacity
S-3. S-5. S-6 baghouse	200 gallon
S-7	150 Gallon
SA-2, SA-3, SA-4	50 gallon

3.01 **Applicable Regulation/Effective Date**

Section 212.322 for TSP emissions/Amended at 3 Ill. Reg. 184, effective September 28, 1979.
Section 215.625 for VOM emissions/Added at 12 Ill. Reg. 7311, effective April 8, 1988.

3.02 **Process Flo Diagram**

VOM
TSP (BH)
A-- S-W Batch Mills---------- Storage and other operations
Total 7
Pigment
Vehicle
Solids
Solvents

3.03 **Emission Calculations**

Emissions calculations are based on information submitted by the Company in the operating permit application #72100426, submitted on 4-21-87.

Emissions are total from all seven mills.

	AVERAGE EMISSIONS					
	Uncontrolled		Controlled Actual		Allowable	
	lbs/hr	TPY	lbs/hr	TPY	lbs/hr	TPY
TSP	10.0	11.2	0.01	0.01	1.8	2.0
HC	0.21	0.25	0.21	0.25	56.0	63.0
NOx	-	-	-	-	-	-
CO	-	-	-	-	-	-
SO_2	-	-	-	-	-	-

3.1 **Emission Source Identification** [18 High Speed Dispersers - controlled by Wheelabrator dust collection system - P. No. 72100426]

Disperser Number	Maximum Capacity	Working Capacity
C-3	75 Gal.	35-75 Gal.
C-24	140 Gal.	60-140 Gal.
*C-7, C-8, C-14, C-15, C-16	500-514 Gal.	200-500 Gal.
C-1, C-2, C-5, C-6 C-17, C-18, C-20, C-22	575-600 Gal.	200-600 Gal.
C-19	821 Gal.	430-821 Gal.
C-21, C-23	1600 Gal.	500-1600 Gal.

*C-7, C-14 and C-15 serve as pre-mixers for Continuous Bead Mills.

High Speed Dispersers are also referred to as Cowles Mixers or Mills.

3.11 Applicable Regulation/Effective Date

Section 212.322 for TSP emissions/Amended at 3 Ill. Reg. 184, effective September 28, 1979.
Section 215.624 for VOM emissions/Added at 12 Ill. Reg. 7311, effective April 8, 1988.

3.12 Process Flow Diagram

VOM
TSP (BH)
A----- 18 High speed dispersers ----- other operations
Pigment
Vehicle
Solids
Solvent

3.13 Emission Calculations

Emission calculations for all the dispersers combined. Basis: Permit Files.

	AVERAGE EMISSIONS					
	Uncontrolled		Controlled Actual		Allowable	
	lbs/hr	TPY	lbs/hr	TPY	lbs/hr	TPY
TSP	3.0	1.3	Nil	Nil	6.7	3.0
HC	0.2	0.1	0.2	0.1	144.0	64.8

3.2 Emission Source Identification [10 Ball Mills controlled by Torit dust collection system. P. No. 721004261

Mill Number	Size	Gross Capacity	Maximum Paste Volume
B-1	6'D x 8'L	1,639 Gal.	655 Gal.
B-3	6' x 8'	1,639 Gal.	655 Gal.
B-12	5' x 8'	1,639 Gal.	655 Gal.
B-4	5' x 6'	863 Gal.	345 Gal.
B-5	5' x 6'	863 Gal.	345 Gal.
B-6	5' x 6'	863 Gal.	345 Gal.
B-11	5' x 6'	863 Gal.	345 Gal.
B-7	4' x 5'	455 Gal.	182 Gal.
B-8	4' x 5'	455 Gal.	182 Gal.
B-9	21" x 38"	33 Gal.	16 Gal.

3.21 **Applicable Regulation/Effective Date**

Section 212.322 for TSP emissions/Amended at 3 Ill. Reg. 184, effective September 28, 1979.
Section 215.624 for HC emissions/Added at 12 Ill. Reg. 7311, effective April 8, 1988.

3.22 **Process Flow Diagram**

HC
TSP (BH)
A--- Ball Mills---------- other operations
Pigment
Vehicle
Solids
Solvents

3.12 **Emission Calculations**

Emissions for all the 10 ball mills combined.
Basis - Permit Files.

	AVERAGE EMISSIONS					
	Uncontrolled		Controlled Actual		Allowable	
	lbs/hr	TPY	lbs/hr	TPY	lbs/hr	TPY
TSP	3.0	3.6	Nil	Nil	1.7	2.0
HC	0.1	0.1	0.1	0.1	80.0	98.5

3.3 **Emission Source Identification** [Paste Mixers - controlled by Torit baghouse dust collection system - P. No. 72100426]

Mixer Number	Maximum Working Capacity
P-3	250 Gallon
P-4	250 Gallon
P-5	250 Gallon

[Myers Mixers - Controlled by Torit baghouse dust collection system]

Mixer Number	Nominal Volume	Working Capacity
MC-1	215 Gal.	60-165 Gal. (Portable)
MC-2	704 Gal.	225-600 Gal. (Fixed)

All the above mixers are vented to Torit dust collection system.

3.31 **Applicable Regulation/Effective Date**

Section 212.322 for TSP emissions/Amended at 3 Ill. Reg. 184, effective September 28, 1979.
Section 215.624 for VOM emissions/Added at 12 Ill. Reg. 7311, effective April 8, 1988.

3.32 **Process Flow Diagram**

HC
TSP (BH)
A---- Mixers----- Ball Mills----- other operations
Pigment
Vehicle
Solids
Solvents

3.33 **Emission Calculations**

Emissions for all the mixers combined
Basic: Permit files.

	AVERAGE EMISSIONS					
	Uncontrolled		Controlled Actual		Allowable	
	lbs/hr	TPY	lbs/hr	TPY	lbs/hr	TPY
TSP	3.0	0.4	Nil	Nil	4.0	0.5
HC	0.1	-	0.1	Nil	40.0	5.0

3.4 **Emission Source Identification** [Continuous Bead Mills - P. No. 721004261

Mill Number	Type	Capacity
SC-4	Sussmeyer Vertical	30 Gal.
SC-5	Sussmeyer Vertical	30 Gal.
SC-6	Sussmeyer Vertical	30 Gal.
SC-7	Sussmeyer Horizontal	120 Liter
SC-8	Sussmeyer Vertical	16 Gal.
SC-9	Coball	3.4 Liter
SC-11	Netsch Jon	33 Liter

3.41 **Applicable Regulation/Effective Date**

The Bead mills are sealed unit and have no vents.
No applicable regulations.

3.42 **Process Flow Diagram**

```
                    No vents
A--- Mixers------ Bead mills---------- other operations
                    Paint paste
                    from mixers
```

3.43 **Emission Calculations**

No emissions exhausted from the bead mills.

3.5 Emission Source Identification [Product Blending & Mixing Tanks - P.No. 72100426]

Nominal Capacity	Number of Tanks	Total Capacity by Size
300 Gal.	12	3,600 Gal.
500 Gal.	13	6,500 Gal.
600 Gal.	1	600 Gal.
700 Gal.	10	7,000 Gal.
1,000 Gal.	30	30,000 Gal.
1,500 Gal.	34	51,000 Gal.
2,000 Gal.	34	68,000 Gal.
3,000 Gal	13	39,000 Gal.
4,000 Gal.	8	32,000 Gal.
7,000 Gal.	3	21,000 Gal
	158	258,700 Gal.

The above tanks are all used for mixing paint. Tanks have removable covers and are vented inside the building. Only HC are emitted from these tanks.

3.51 **Applicable Regulation/Effective Date**

Section 215.623 thru 215.63[illegible] for HC emissions/Added at 12 Ill. Reg. 7311, effective date April 8, 1988.

3.52 Process Flow Diagram

```
     HC
A--- Blending tanks-------- Package------ Ship
     Paint Paste
     Solvents
     Pigments
```

3.53 Emission calculations

AP-42 Table 5.10-1 lists VOC emissions as 1 to 2 percent of paint manufactured.
Paint production: 10 million gallons of paint per year.
VOC Emission Calculations:
Production 5000 gals/hr of paint
Operating hours per year = 2000 hrs
VOC emissions: 5000 gals/hr x 1.5 gal VOC emitted/100 gal. of paint = 75 gals.
VOC Density average = 7.36 lbs/gal
VOC emissions = 552 lbs/hr = 552 TPY

3.6 Emission Source Identification [Four high speed mixing tanks - TSP emissions controlled by Wheelabrator Frye baghouse dust collection system - P.No. 77040012]

3.61 Applicable Regulation/Effective Date

Section 212.321 for TSP emissions/Amended at 3 Ill. Reg. 184, effective September 28, 1979.

3.62 Process Flow Diagram

```
     TSP (BH)
A--- Mixers-------- Storage and other operations
     Pigments
     Vehicle
     Water
```

3.63 Emission Calculations

AP-42 Table 5.10-1 (May 1983 update) lists TSP emission to be 20 lbs/ton
PWR = 10,2000 lbs/hr - 5.1 TPH (for each mixer)
Operating hours = 16 hrs/5 days/50 wks
Uncontrolled Emissions TSP = 102 lbs/hr = 204 TPY
Baghouse Control efficiency - 99.9%
Controlled TSP emission - 0.1 lbs/hr - 0.2 TPY
Allowable TSP emissions = 6.1 lbs/hr = 12.2 TPY

Total Emissions from all 4 mixers
Actual TSP emissions = 0.4 lbs/hr = 0.8 TPY

3.7 Emission Source Identification [Thin and Shade mixing tanks P.No. 77040012]

3.71 Applicable Regulation/Effective Date

Section 212.321 for TSP emissions/Amended at 3.24 Reg. 184, effective September 28, 1979.

3.72 Process Flow Diagram

TSP
A--- Mixers---- Thin & shade tanks--- Storage and filling
Paint
Additives

3.73 Emission Calculations

Emissions: TSP only. Basis: Permit Files
PWR = 8700 lbs/hr = 4.35 TPH
Operating hours = 4000 hrs/yr
TSP Emissions Actual = 0.1 lbs/hr = 0.2 TPY
Allowable = 5.6 lbs/hr = 11.2 TPY

3.8 Emission Source Identification [Six Latex tanks - 2-15,000 and 4-30,000 gals P.No.77040012]

3.81 Applicable Regulation/Effective Date

N/A

3.82 Process Flow Diagram

N/A

3.83 Emission Calculations

Nil

3.9 Emission Source Identification [1-7500 gal and 1-15000 gal Propyl and ethylene glycol storage tanks - vapor pressure 0.12 to 0.22 mmHg at 20° C. P.No. 77040012]

3.91 Applicable Regulation/Effective Date

Section 215.122(b)/Amended at 3 Ill. Reg. 124, effective July 28, 1979.

3.92 Process Flow Diagram

N/A

3.93 Emission Calculations

Negligible. The tanks are equipped with submerged loading pipes.

3.10 Emission Source Identification [1-7500 gal surfactant storage tank - vapor pressure 3.2 mmHg at 20° C. P.No.730400012]

3.101 Applicable Regulation/Effective Date

No applicable rule.

3.102 Process Flow Diagram

N/A

3.103 Emission Calculations

No emissions.

3.11 Emission Source Identification [3-6000 gal. polyglycol alkyds tanks. Vapor pressure less than 0.01 mmHg at 20° C. P.No. 77040012]

3.111 Applicable Regulation/Effective Date

No applicable rule.

3.112 Process Flow Diagram

N/A

3.113 Emission Calculations

No emissions

3.12 Emission Source Identification [Eight storage silos to store raw material, pigments and extenders. Each storage silo is equipped with baghouse dust collector P.No. 77040012]

3.121 Applicable Regulation/Effective Date

Section 212.321 for TSP emissions/Amended at 3 Ill. Reg. 184, effective September 28, 1979.

3.122 Process Flow Diagram

```
            TSP (BH)
Rail car--- Silos-------------other operations
            Pigments
            Extenders
```

3.123 Emission calculations:
No date currently available to calculate emissions.

3.13 **Emission Source Identification** [Feed bins controlled by a baghouse Raw material from silos transported pneumatically to the feed bins which feed to the high speed mixers.]

3.131 **Applicable Regulation/Effective Date**

Section 212.321 for TSP emissions/Amended at 3 Ill. Reg. 184, effective September 28, 1979.

3.132 **Process Flow Diagram**

```
                              TSP (BH)
Silos --- Pneumatic------ Feed bin------- High speed mixers
          conveyor        Pigment
                          Extenders
```

3.133 Emission calculations

Closed loop system. No emissions.

3.14 **Emission Source Identification** [Two gas fired boilers for space heating - Rated capacity 6.277 MMBTU each]

3.141 **Applicable Regulation/Effective Date**

No applicable regulations.

3.142 **Process Flow Diagram**

N/A

3.143 **Emission Calculations**

Emissions of TSP, SO_2, NOx, CO & HC are negligible from these boilers.
NOTE: These two boilers are currently not permitted by the Agency.

3.15 **Emission Source Identification** [4 Resin reactors R-1, R-2, R-3 and R-4: 1-1,000 gal, 2-5000 gal, & 1-10,000 gal. Each respectively controlled by condensers HR-1, HR-2, HR-3 and HR-4. Reactors R-1 to R-3 are steam heated and R-4 is oil heated. Listed in item 1.032 of this report. P. No. 82110038]

3.151 **Applicable Regulation/Effective Date**

Section 215.960 for HC emission/Added at 12 Ill. Reg. 7311, effective ~~July 28, 1979.~~ April, 8, 1988.

3.152 Process Flow Diagram

```
                    HC (Cond)
Raw Material------ Resin Reactors---------- other operations
                    Monomers
                    Surfactants
                    Water
                    Stabilizers
                    Initiators
                    Ammonia
```

3.153 Emission Calculations

HC Emissions
Basis: Permit files
HC emissions total for all reactors
Actual HC Emissions = 2.97 lbs/hr = 8885 lbs/yr = 4.44 TPY
Operating hours = 3000 hrs/yr
Allowable Emissions = 32 lbs/hr = 48 TPY

3.16 Emission Source Identification [Ten thinning and prefilter tanks. T-1 to 2, T6 to 8 and V-9 to 13 controlled by condensers HT 1-2, HT 6-13. Listed in item 1.033 of this report P.No. 82110038]

3.161 Applicable Regulation/Effective Date

Section 215.960 for HC emissions/Added at 12 Ill. Reg. 7311, effective April 8, 1988.

3.162 Process Flow Diagram

```
          HC (Cond.)
Reactor---- Thinning and---------- other operations
          Prefilter tanks
          Resin
          Solvents
```

3.163 Emission Calculations

Emission Calculations from all 10 thinning tanks:
HC Emissions
Basis: Permit files
operating hours = 4200 hrs
Actual HC emissions from all 10 thinning tanks = 0.14 lbs/hr - 0.3 TPY
Allowable HC Emissions = 80.0 lbs/hr 168.0 TPY

3.17 **Emission Source Identification** [Misc. storage tanks-Total 103, ranging in capacity from 5000 gal. to 102,731 gallons. 101 tanks less than 26,000 gal. capacity. One tank 51,200 gal. capacity used to store glyceryl Pthalate with vap.pressure 0.04 psia. One tank 102,731 gallons capacity used to store mineral spirits with vap. pressure 0.04 psia. Listed in item 1.031 of this report. P.No. 82110038.]

3.171 **Applicable Regulation/Effective Date**

Section 215.121 for HC emissions/Amended at 7 Ill. Reg. 1244, effective January 21, 1983.

3.172 **Process Flow Diagram**

N/A

3.173 **Emission Calculations**

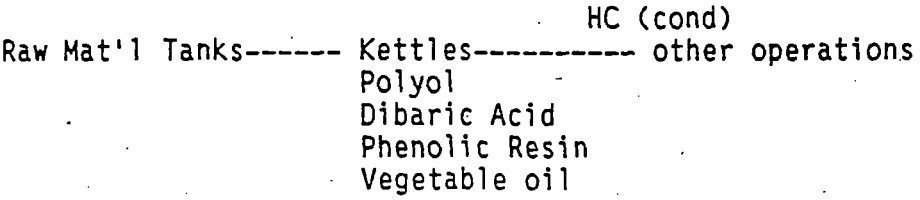
Emissions included in the resin and paint manufacturing sources.

3.18 **Emission Source Identification** [Five varnish cooking kettles K-1, 2, 6, 7 & 8, all equipped with individual condensers. HK1, 2, 6, 7 and 8. Listed in item 1.032 of this report. P. No. 82110038]

3.181 **Applicable Regulation/Effective Date**

Section 215.960 for HC emissions/Added at 12 Ill. Reg. 7311, effective April 1, 1988.
Section 212.321 for TSP emissions/Amended at 3 Ill. Reg. 184, effective September 28, 1979.

3.182 **Process Flow Diagram**



3.183 Emission Calculations

Total for all 5 kettles. Condensers to control OM on all kettles and packed column on Kettles #1 and 8 to control TSP during processing of polyester.

Total Average Emissions:

	Uncontrolled		Controlled Actual		Allowable	
	lbs/hr	TPY	lbs/hr	TPY	lbs/hr	TPY
TSP*	2.44	Nil	0.24	Nil	Nil	Nil
HC**	30.0	82.5	1.5	4.1	40.0	110.0

* Operating hours for TSP emissions are only 150-750 hrs/yr and that too while making polyester type formulations in kettles 1 and 8 only. Emissions are estimated to be negligible.

** Operating hours are 5500 hrs/yr

3.19 Emission Source Identification

The following combustion equipment used for providing heat to the kettles. They are all natural gas fired and are indirect heating units. Total combined rated capacity 5.34 MMBTU. P.No. 82110048.

COMBUSTION EQUIPMENT

ITEM NO.	LOCATION	Nominal Firing Rate
CD-1	Bldg 48-2	2,000,000 BTU/hr
CD-2	Bldg 48-B	1,240,000 "
CD-6	Bldg 25	550,000 "
CD-7	Bldg 25	550,000 "
CD-8	Bldg 48-A	1,000,000 "

3.191 Applicable Regulation/Effective Date

No applicable regulations.

3.192 Process Flow Diagram

N/A

3.193 Emission Calculations

Emissions of TSP, NOx, CO, HC and SO_2 are negligible.

3.20 Emission Source Identification [Three gas fired boilers. Maximum rated capacities: 1-1.338 MMBTU and 2-4.4 MMBTU]

3.201 Applicable Regulation/Effective Date

No applicable regulations.

3.202 Process Flow Diagram

N/A

3.203 Emission Calculations

Negligible emissions of TSP, SO_2, HC, NOx and CO from these boilers.

4.0 Permit Status

P.No	Title	Granted	Expires
72100426	Paint manufacturing plant	4/26/88	3/31/93
77040012	Chicago Coating plant	1/5/87	12/31/90
82110038	Resin manufacturing plant	7/21/89	7/19/94
87040037	Nat.Gas fired boilers	5/8/87	4/16/92

4.1 Standard Conditions

Facility in compliance with Standard Conditions of the operating permit.

4.2 Special Conditions

P No. 87040037 Special Conditions

1. Operation of the emission source(s) included in this permit shall not begin until all associated air pollution control equipment has been constructed and is operational.

2. Emissions of particulate matter and nitrogen oxides shall not exceed 0.22 tons/year and 4.43 tons/year, respectively. These limits are based on the maximum hours of operation and the maximum firing rate, indicated in the permit application.

Analysis: The Special Condition in P.No. 87040037 is being complied with by the company.

4.3 New Source Review

No sources subject to New Source Review.

5.0 Fugitive Dust Program

The facility's fugitive dust program was accepted by the Agency on March 31, 1983. No fugitive dust observed from this facility.

6.0 Opacity Observations

No opacity readings taken.

6.1 Visible Emission Observations

No visible emissions observed being emitted from the plant.

7.0 Emission Calculations

See Section 3.0 through 3.20 of this report for emission calculations.

7.1 Part 215 Organic Material Emission Calculations and Standards

See Section 3.0 through 3.20 of this report for emission calculations.

8.0 Equipment Standards 624 and 215.625

~~No sources subject to equipment standard.~~

9.0 NSPS

No sources subject to NSPS.

10.0 NESHAP

No sources subject to NESHAP.

11.0 Stack Tests

No stack tests on file with the Agency.

11.1 Total Annual Plant Emissions (T/Y) Various Pollutants

	Actual TPY
TSP	1.35
HC	572.0
NOx	6.81
SO_2	Nil
CO	Neg.

12.0 Section 9(a) Factors

No recent complaints filed with the Agency.

13.0 Multi-Media Factors

No known multi media factors.

13.1 Chemical Safety

Chemical Safety Contingency Plan was reviewed during 12-3-86 inspection by Ed Osowski and Cezary Krzymowski of the Agency.

14.0 **Attainment/Non Attainment/Geographical Descriptio**

Facility is located in a non-attainment area for TSP and ozone. The facility is also located in a PM-10 study area.

15.0 **Findings/Conclusions/Recommendations**

6-15-89 and 4-15-89 Inspection findings by H. Narayen:

The facility manufactures resin, varnish and paint. The paint division is subject to Subpart AA Section 215.620 requirements for solvent base paint manufacturing sources. The facility has instituted leak test program for all sources in the paint department. All the grinding mills are enclosed and paint mixing and thinning tanks have covers.

The facility is currently in compliance with Illinois Air Pollution Control Regulations.

3-11-88 Inspection by H. Narayen:
This facility is currently in violation of Section 201.143 and 201.144 for failure to obtain construction and operating permits for the two gas fired boilers in the emulsion plant.

In addition, the facility does not have operating permits for the following sources:

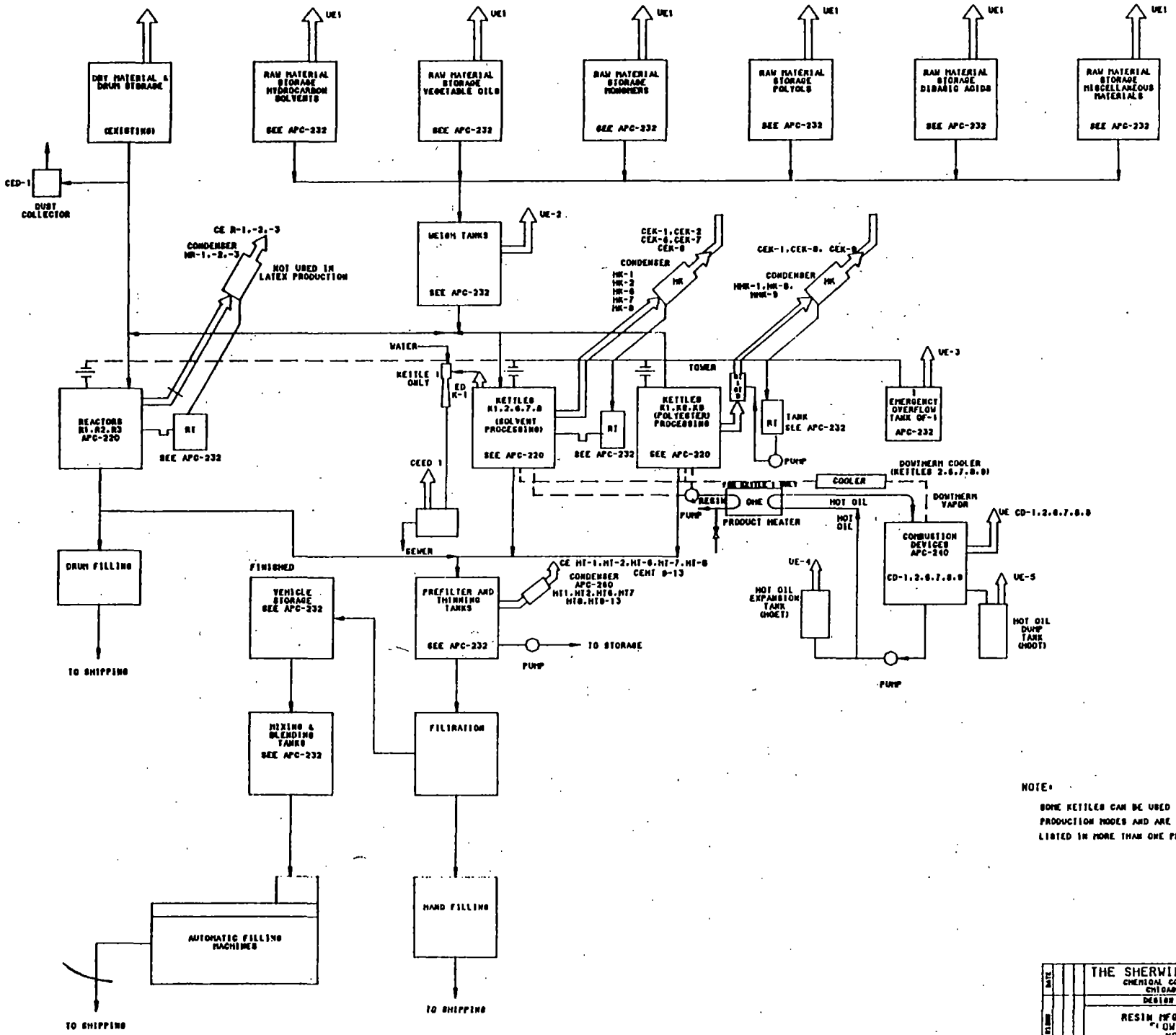
a) Eight silos with individual baghouses.
b) One of the four high speed mixers controlled by a common baghouse dust collection system.
c) One pneumatic conveying system and weigh bins vented to a baghouse dust collection system.
d) One of the six kettles and condenser in the resin plant.

The facility has also failed to demonstrate to the Agency that the resin manufacturing reactors and associated equipment are currently either exempt or are in compliance with the requirements of Section 215.430 through 215.438.

3/11/87
A CIL is being sent to the facility for the above violations.

HN:bh:1882L

cc: M. Zamco
File



NOTE:

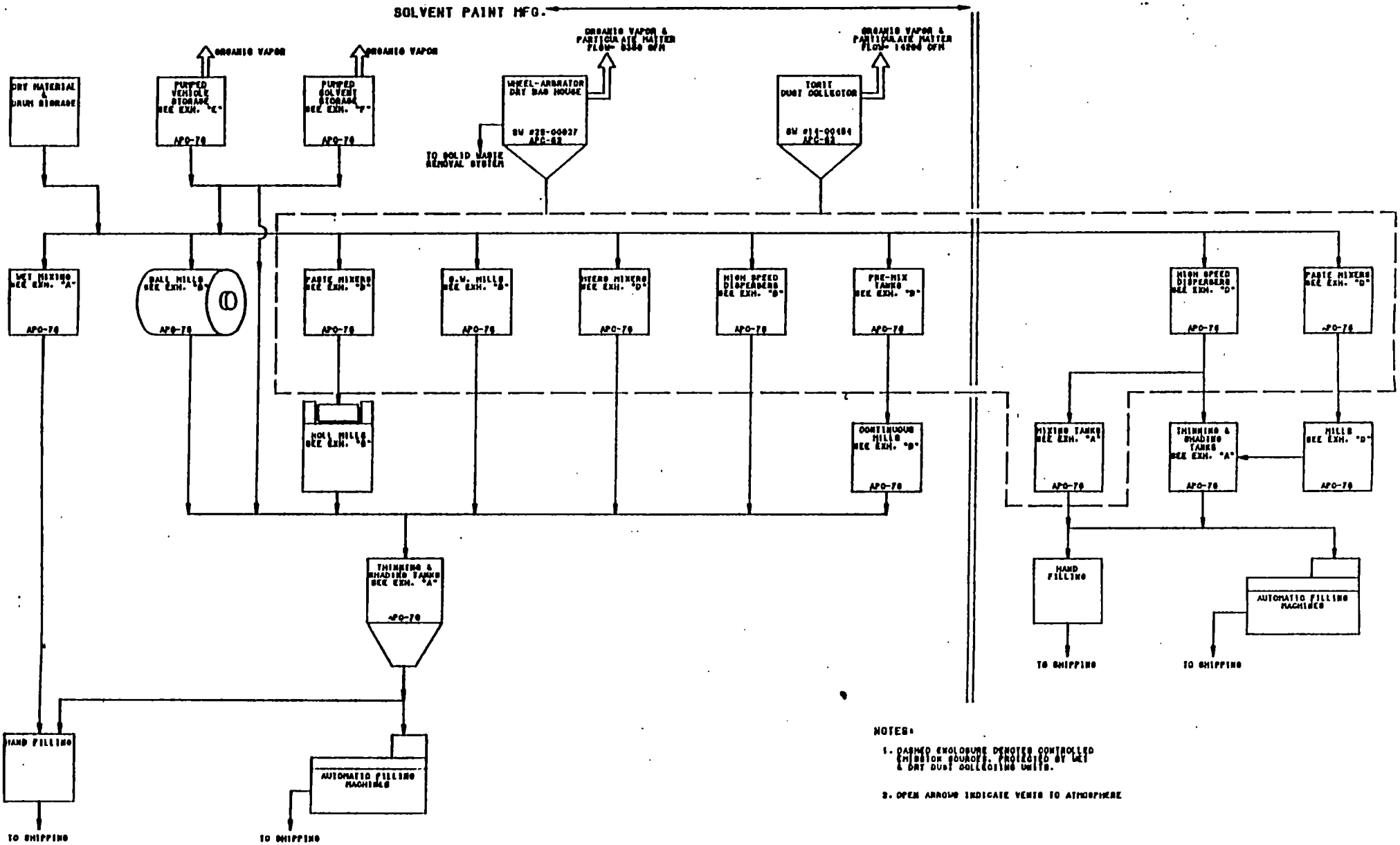
SOME KETTLES CAN BE USED IN 2 PRODUCTION MODES AND ARE THEREFORE LISTED IN MORE THAN ONE PLACE.

THE SHERWIN-WILLIAMS CO.
CHEMICAL COATINGS DIVISION
CHICAGO, ILL. 60620
DESIGN ENGINEERING

RESIN MFG. DEPARTMENT
FLOW DIAGRAM
NOIS E.P.A.

DATE
DESIGNED

6.1.21



NOTES:

1. DASHED ENCLOSURE DENOTES CONTROLLED EMISSION SOURCES, PROTECTED BY WET & DRY DUST COLLECTING UNITS.

2. OPEN ARROWS INDICATE VENTS TO ATMOSPHERE

THE SHERWIN-WILLIAMS CO.
CHEMICAL COATINGS DIVISION
CHICAGO, ILL 60620
DESIGN ENGINEERING

PAINT MFG. DEPARTMENT
FL[illegible] IAGRAM
II E.P.A.

DATE 04-JAN-
DESIGNED BY

APPENDIX IX

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1989 GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For Agency use | L | P | H | W | C | (1-5) CARD | 2 | 0 | (6-7) TRANS | A | (8) | 0 | 2 | 2 | 8 | 9 | 0 | (9-14)

GENERATOR USEPA I.D. NUMBER (17) | I | L | | | | | | GENERATOR IEPA I.D. NUMBER ILD 005 456 434 051 65000 03

GENERATOR COMPANY NAME: GENERAL MANAGER SHERWIN WILLIAMS CO

MAILING ADDRESS: 11541 S CHAMPLAIN AVE CHICAGO IL 60628
STREET CITY/STATE ZIP

LOCATION WASTE GENERATED: 11541 S. Champlain Ave., Chicago, 60628
STREET CITY ZIP

CONTACT PERSON: Robert C. Martin (312) 821-3102
NAME A/C PHONE

GENERATOR SIC CODE | 2 | 8 | 5 | 1 |

NON-REGULATED STATUS If your company was not regulated during 1989, circle the numeric code (1-5) that describes your non-regulated status during the entire year AND circle the code for the time period this status is expected to apply (6-8). Sign and date this form and attach comment page before mailing.

a. (15) 1 NO HAZARDOUS WASTE SHIPPED OFF-SITE

(15) 2 SMALL QUANTITY GENERATOR (Did not generate more than 1000 kg of hazardous waste (or 1 Kg acutely hazardous waste) in any month or accumulate 6000 kg hazardous waste for more than 180 days or more than 270 days for waste transported to a facility over 200 miles away.)

(15) 3 FARMING OR OTHER OPERATIONS EXEMPT UNDER 35 Ill. Adm. Code 721.104

(15) 4 EXEMPT UNDER 35 Ill. Adm. Code 721.106

(15) 5 CLOSED (Prior to 1/1/89) and no waste was shipped off-site

b. (16) 6 FOR 1989 ONLY, explain in comment section

(16) 7 PERMANENTLY, explain in comment section

(16) 8 OTHER, explain in comment section

REGULATED STATUS If your company does not qualify for non-regulated status it is regulated for 1989. You must complete the entire report including Page 1 (Generator Information), Page 2 (Comments), Page 3 (Waste Minimization), Page 4 (Transportation Services) and Page(s) 5, 6, 7, etc. (Facility Information).

This Agency is authorized to require this information under Illinois Revised Statutes, 1981, Chapter 111-1/2, Sections 1004 and 1021(f)(2). Disclosure of this information is required. Failure to do so may result in a civil penalty up to $25,000 for each day the failure continues, a fine up to $1,000,000.00 and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

CERTIFICATION I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Robert C. Martin | Director/Environmental Services | Robert C Martin | 2/15/90
PRINT/TYPE NAME | TITLE | SIGNATURE | DATE

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1989 GENERATOR ANNUAL HAZARDOUS WASTE REPORT

GENERATOR USEPA I.D. NUMBER IL: ILD005456439

GENERATOR IEPA I.D. NUMBER: 0316500003

COMMENTS:

The reduction in still bottoms waste didn't begin until June of 1989. Compared to June thru December of 1988, there was a reduction of 190,144 gallons. (505,100 gallons to 314,956 gallons.)

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1989 GENERATOR ANNUAL HAZARDOUS WASTE REPORT

GENERATOR USEPA I.D. NUMBER: ILD0005456439

GENERATOR IEPA I.D: 0316500003

I. WASTE MINIMIZATION ACTIVITY

a. Efforts taken in 1989 to implement waste minimization includes the following (this can be reduction of total volume of waste or reduction of toxicity, or both, consistent with minimizing present or future threats to human health and the environment): (Indicate all that apply)

(YES) NO — Did you create or expand a source reduction program during report year? This implies any action that reduces the toxicity or amount of waste exiting a process, such as feedstock modifications, process modifications, housekeeping practices.

YES NO — Did you create or expand an on-site recycling program during the report year? This implies use, reuse, or reclamation of a waste after it has been generated.

(YES) NO — Did you conduct a source reduction and/or recycling opportunity assessment or audit during the report year?

(YES) NO — Did you use the Industrial Materials Exchange Service or another waste exchange during the report year?

IF you answered "no" to ALL of these questions, continue to section c. If you answered "yes" to ANY of these questions, continue to section b.

b. (YES) NO Did these efforts result in minimization of waste?

IF "yes" identify the waste stream minimized:

Waste type (page 6 of instructions):__ __

RCRA Hazardous Waste Code (Appendix C):__ __ __ __

Method of minimization:

___ On-site recycling
_X_ Equipment or technology modification/substitution
___ Process modification/substitution
___ Feedstock modification
___ Waste stream segregation
___ Industrial Materials Exchange Service or other waste exchange
_Y_ Improved housekeeping
___ Other (Specify):_____

Results of minimization:

Toxicity reduction YES (NO)

Quantity prevented: _____gallons

Did efforts result in increase in emissions to air, land or water? YES NO

c. What factors delayed or prevented implementation of waste minimization?

___ Insufficient capital
___ Permitting burdens
___ Technical limitations
___ Not economically feasible
___ Other, explain: _____

II. ON-SITE WASTE MANAGEMENT STATUS

YES (NO) — Waste is managed on-site in RCRA permitted units and is being reported on a Facility Annual Report.

(YES) NO — Waste was treated, recycled, or disposed on-site in units exempt from RCRA permitting requirements. (This includes discharges under NPDES permits, direct discharges to a POTW, on-site treatment and discharge to municipal treatment works, on-site recycling, burning in industrial boilers and furnaces for energy recovery.)

If "yes" the waste type (from page 6 of the instructions) is 0 3.

The amount of waste so managed during the report year was 8990 tons.

If a second waste type is so managed, the waste type is __ __ and the amount managed was _____tons.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1989 GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For Agency use | L P H W C (1–5) | CARD 6 0 (6–7) | TRANS A (8) | 0 2 2 8 9 0 (9–14)

GENERATOR USEPA I.D. NUMBER (18–29): I L D 0 5 4 5 6 4 3 9

GENERATOR IEPA I.D. NUMBER (30–39): 0 3 1 6 5 0 0 0 0 3

LIST OF TRANSPORTATION SERVICES (HAULERS) USED: *List each hauler only once regardless of the number of individual waste shipments.*

LINE NO.	TRANSPORTER NAME/ ADDRESS	TRANSPORTER USEPA I.D. NO.	TRANSPORTER ILLINOIS EPA I.D. NUMBER
01 (63–64)	Groen Bros., Blue Island, IL 60406	I L D 0 6 8 5 9 0 2 6 9 (95–106)	0 0 5 (107)
02 (63–64)	Heritage Transport, Indianapolis, IN 46231	I N D 0 5 8 4 8 4 1 1 4 (95–106)	1 5 5 (107)
03 (63–64)	Chemical Services, Crestwood, IL 60445	I L D 9 8 0 7 0 1 1 6 0 (95–106)	1 3 0 (107)
04 (63–64)	SET Liq. Waste, Wheeling, IL 60090	I L D 9 8 1 9 5 7 2 3 6 (95–106)	1 2 5 (107)
05 (63–64)	Safety Kleen, Portage, IN 46368	I N D 0 0 0 7 1 4 4 2 8 (95–106)	1 1 2 (107)
06 (63–64)	Mr. Frank, So. Holland, IL 60473	I L D 0 6 9 5 0 6 1 6 0 (95–106)	0 0 7 (107)
07 (63–64)	Ross Transportation, Grafton, OH 44044	O H D 9 8 0 6 1 4 3 7 4 (95–106)	0 7 3 (107)
08 (63–64)	Titan Oil, Indianapolis, IN 46225	I N D 0 0 0 6 4 6 9 5 0 (95–106)	0 4 2 (107)
09 (63–64)	L.W.D. Trucking Inc., Calvert City, KY 42029	K Y D 9 8 1 4 7 7 8 2 1 (95–106)	0 5 7 (107)
10 (63–64)	CLEAN HARBORS OF KINGSTON, KINGSTON, MA 02364	M A D 0 3 9 3 2 2 2 5 0 (95–106)	8 0 0 (107)

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1989 GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For Agency use | L | P | H | W | C | (1–5) | CARD | 6 | 0 | (6–7) | TRANS | A | (8) | 0 | 2 | 2 | 8 | 9 | 0 | (9–14)

GENERATOR USEPA I.D. NUMBER (18–29): | I | L | D | 1 | 0 | 1 | 5 | 4 | 5 | 6 | 4 | 3 | 9 |

GENERATOR IEPA I.D. NUMBER (30–39): | 0 | 3 | 1 | 6 | 5 | 0 | 0 | 0 | 0 | 3 |

LIST OF TRANSPORTATION SERVICES (HAULERS) USED: *List each hauler only once regardless of the number of individual waste shipments.*

LINE NO. (63–64)	TRANSPORTER NAME/ ADDRESS	TRANSPORTER USEPA I.D. NO. (95–106)	TRANSPORTER'S ILLINOIS EPA I.D. NUMBER (107–110)
01	Price Trucking, Buffalo, NY 14207	N Y D 0 4 6 7 6 5 5 7 4	0 2 1 7
02			
03			
04			
05			
06			
07			
08			
09			
10			

Page 0 0 0 5 (15–17)

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1989 GENERATOR ANNUAL HAZARDOUS WASTE REPORT

FOR AGENCY USE | L P H W C | (1–5) | CARD | 5 0 | (6 7) | TRANS | A | (8) | 0 2 2 8 9 0 | (9–14)

GENERATOR USEPA I.D. NUMBER (18–29): I L D 0 0 5 4 5 6 4 3 9

GENERATOR IEPA I.D. NUMBER (30–39): 0 3 1 6 5 0 0 0 0 3

Complete one of these pages for each Facility utilized during the year. **All facilities in or out of state** receiving hazardous waste generated in Illinois have a USEPA and a IEPA I.D. Number. Obtain this information from Appendix B, the facility or from your manifest copy.

FACILITY USEPA I.D NUMBER (41–52): I N D 0 0 0 7 1 4 4 2 8

FACILITY IEPA I.D. NUMBER (53–62): 9 1 8 1 2 7 9 4 6 9

Safety Kleen — FACILITY NAME

(219) 763-4554 — A/C PHONE

6050 Eagle Ave. — ADDRESS (where waste was managed)

Portage, — CITY

IN — STATE

46368 — ZIP

LINE NO	DESCRIPTION OF WASTE	WASTE TYPE (67–68)	RCRA HAZARDOUS WASTE CODE (69–84)	AMOUNT (gals. only) (85–93)	DENSITY (lbs./gal) (94–96)	ORIGIN (132)	M C (133)
1 (66)	Waste Petroleum Naphtha Liquid Automotive Cleaner	0 5	D 0 0 1	1 5 4	7 . 0	1	0
2 (66)					.		
3 (66)					.		
4 (66)					.		
5 (66)					.		
6 (66)					.		
7 (66)					.		
8 (66)					.		

Page 0 0 0

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1989 GENERATOR ANNUAL HAZARDOUS WASTE REPORT

FOR AGENCY USE | L | P | H | W | C | (1–5) | CARD | 5 | 0 | (6–7) | TRANS | A | (8) | 0 | 2 | 2 | 8 | 9 | 0 | (9–14)

GENERATOR USEPA I.D. NUMBER (18–29): I L D 0 0 5 4 5 6 4 3 9

GENERATOR IEPA I.D. NUMBER (30–39): 0 3 1 6 5 0 0 0 0 3

Complete one of these pages for each Facility utilized during the year. All facilities in or out of state receiving hazardous waste generated in Illinois have a USEPA and a IEPA I.D. Number. Obtain this information from Appendix B, the facility or from your manifest copy.

FACILITY USEPA I.D NUMBER (41–52): I N D 9 8 0 5 9 0 9 4 7

FACILITY IEPA I.D. NUMBER (53–62): 9 1 8 1 4 1 0 0 0 4

FACILITY NAME	A/C	PHONE
Industrial Fuels & Resources	(219)	234-0441

ADDRESS (where waste was managed)	CITY	STATE	ZIP
604 S. Scott St.	South Bend,	IN	46986

LINE NO.	DESCRIPTION OF WASTE	WASTE TYPE (67–68)	RCRA HAZARDOUS WASTE CODE (69–84)	AMOUNT (gals. only) (85–93)	DENSITY (lbs./gal) (94–96)	ORIGIN (132)	M/C
1 (66)	Still Bottoms N.O.S. UN1993	0 3	F 0 0 5	4 7 2 7 7 6	8 . 1	1	1
2 (66)	Waste Paint/Caustic Wash N.O.S. UN1993	0 7	F 0 0 5 D 0 0 1 D 0 0 2	8 5 0 0	8 . 5	1	1
3 (66)	Resin Sludge N.O.S. UN1993	1 4	D 0 0 1	5 0 0 0	9 . 0	1	1
4 (66)	Waste Solvent N.O.S. UN1993	0 3	F 0 0 5	5 0 0 0	8 . 0	1	1
5 (66)					.		
6 (66)					.		
7 (66)					.		
8 (66)					.		

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1989 GENERATOR ANNUAL HAZARDOUS WASTE REPORT

FOR AGENCY USE | L P H W C | (1–5) CARD | 5 0 | (6–7) TRANS | A | (8) | 0 2 2 8 9 0 | (9–14)

GENERATOR USEPA I.D. NUMBER (18–29): I L D 0 0 5 4 5 6 4 3 9

GENERATOR IEPA I.D. NUMBER (30–39): 0 3 1 1 6 5 0 0 0 0 3

Complete one of these pages for each Facility utilized during the year. All facilities in or out of state receiving hazardous waste generated in Illinois have a USEPA and a IEPA I.D. Number. Obtain this information from Appendix B, the facility or from your manifest copy.

FACILITY USEPA I.D NUMBER (41–52): K Y D 0 8 8 4 3 8 8 1 7

FACILITY IEPA I.D. NUMBER (53–62): 9 2 1 1 5 7 0 0 0 1

L.W.D. Inc. — FACILITY NAME

(502) 395-8313 — A/C PHONE

P. O. Box 327 — ADDRESS (where waste was managed)

Calvert City, — CITY

KY — STATE

42029 — ZIP

LIN. NO	DESCRIPTION OF WASTE	WASTE TYPE (67–68)	RCRA HAZARDOUS WASTE CODE (69–72, 73–76, 77–80, 81–84)	AMOUNT (gals. only) (85–93)	DENSITY (lbs./gal) (94–96)	ORIGIN (132)
1 (66)	Waste Paint N.O.S. UN1993	1, 4	D 0 0 1	7 7 5 0	1 2 . 0	1
2 (66)					.	
3 (66)					.	
4 (66)					.	
5 (66)					.	
6 (66)					.	
7 (66)					.	
8 (66)					.	

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1989 GENERATOR ANNUAL HAZARDOUS WASTE REPORT

FOR AGENCY USE | L | P | H | W | C | (1–5) | CARD | 5 | 0 | (6–7) | TRANS | A | (8) | 0 | 2 | 2 | 8 | 9 | 0 | (9–14)

GENERATOR USEPA I.D. NUMBER (18–29): I L D 0 0 5 4 5 6 4 3 9

GENERATOR IEPA I.D. NUMBER (30–39): 0 3 1 6 5 0 0 0 0 3

Complete one of these pages for *each Facility utilized during the year.* All facilities in or out of state receiving hazardous waste generated in Illinois have a USEPA and a IEPA I.D. Number. Obtain this information from Appendix B, the facility or from your manifest copy.

FACILITY USEPA I.D NUMBER (41–52): I L D 0 0 8 5 3 4 9 2 6 4

FACILITY IEPA I.D. NUMBER (53–62): 0 3 1 1 6 2 0 0 0 7

FACILITY NAME	A/C	PHONE
Heritage Environmental Services	(708)	739-1150

ADDRESS (where waste was managed)	CITY	STATE	ZIP
Canal Bank Rd., N.E.	Lemont	IL	60439

LINE NO.	DESCRIPTION OF WASTE	WASTE TYPE (67–68)	RCRA HAZARDOUS WASTE CODE (69–84)	AMOUNT (gals. only) (85–93)	DENSITY (lbs./gal) (94–96)	ORIGIN (132)
1	Waste Paint N.O.S. UN1993	0 7	D 0 0 1 F 0 0 3	6 7 1 7 5	8 . 1	1
2					.	
3					.	
4					.	
5					.	
6					.	
7					.	
8					.	

Page blob

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1989 GENERATOR ANNUAL HAZARDOUS WASTE REPORT

FOR AGENCY USE | L | P | H | W | C | (1–5) | CARD | 5 | 0 | (6–7) | TRANS | A | (8) | 0 | 2 | 2 | 8 | 9 | 0 | (9–14)

GENERATOR USEPA I.D. NUMBER (18–29): I L D 0 0 5 4 5 6 4 3 9

GENERATOR IEPA I.D. NUMBER (30–39): 0 3 1 6 5 0 0 0 0 3

Complete one of these pages for each Facility utilized during the year. All facilities in or out of state receiving hazardous waste generated in Illinois have a USEPA and a IEPA I.D. Number. Obtain this information from Appendix B, the facility or from your manifest copy.

FACILITY USEPA I.D NUMBER (41–52): M O D 0 2 9 7 2 9 6 8 8

FACILITY IEPA I.D. NUMBER (53–62): 9 2 9 1 6 3 0 0 0 1

Safety-Kleen Envirosystems — FACILITY NAME

(314) 242-3551 — A/C PHONE

Highway 79 North, P.O.Box 456, — ADDRESS (where waste was managed)

Clarksville, — CITY

MO — STATE

63336 — ZIP

LINE NO	DESCRIPTION OF WASTE	WASTE TYPE (67–68)	RCRA HAZARDOUS WASTE CODE (69–84)	AMOUNT (gals only) (85–93)	DENSITY (lbs./gal) (94–96)	ORGIN (132)
1 (66)	Waste Still Bottoms N.O.S. UN1993	0 3	F 0 0 5	9 3 0 8 9	8.1	1
2 (66)						
3 (66)						
4 (66)						
5 (66)						
6 (66)						
7 (66)						
8 (66)						

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1989 GENERATOR ANNUAL HAZARDOUS WASTE REPORT

FOR AGENCY USE | L P H W C | (1–5) | CARD | 5 0 | (6 7) | TRANS | A | (8) | 0 2 2 8 9 0 | (9–14)

GENERATOR USEPA I.D. NUMBER (18–29): I L D 0 0 5 4 5 6 4 3 9

GENERATOR IEPA I.D. NUMBER (30–39): 0 3 1 6 5 0 0 0 0 3

Complete one of these pages for each Facility utilized during the year. All facilities in or out of state receiving hazardous waste generated in Illinois have a USEPA and a IEPA I.D. Number. Obtain this information from Appendix B, the facility or from your manifest copy.

FACILITY USEPA I.D NUMBER (41–52): I N D 0 0 6 4 1 9 2 1 2

FACILITY IEPA I.D. NUMBER (53–62): 9 1 8 1 3 3 0 0 0 1

Lonestar Industries/Systech — FACILITY NAME

(317) 653-2606 — A/C PHONE

P. O. Box 485 — ADDRESS (where waste was managed)

Greencastle, — CITY

IN — STATE

46135 — ZIP

LINE NO.	DESCRIPTION OF WASTE	WASTE TYPE (67–68)	RCRA HAZARDOUS WASTE CODE (69–72, 73–76, 77–80, 81–84)	AMOUNT (gals. only) (85–93)	DENSITY (lbs./gal) (94–96)	ORIGIN (132)
1 (66)	Waste Still Bottoms N.O.S. UN1993	0 3	F 0 0 5	1 1 1 3 0 0	8.1	1
2 (66)						
3 (66)						
4 (66)						
5 (66)						
6 (66)						
7 (66)						
8 (66)						

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1989 GENERATOR ANNUAL HAZARDOUS WASTE REPORT

FOR AGENCY USE | L | P | H | W | C | (1–5) CARD | 5 | 0 | (6–7) TRANS | A | (8) | 0 | 2 | 2 | 8 | 9 | 0 | (9–14)

GENERATOR USEPA I.D. NUMBER (18–29): | I | L | D | 0 | 0 | 5 | 4 | 5 | 6 | 4 | 3 | 9 |

GENERATOR IEPA I.D. NUMBER (30–39): | 0 | 3 | 1 | 6 | 5 | 0 | 0 | 0 | 0 | 3 |

Complete one of these pages for each Facility utilized during the year. All facilities in or out of state receiving hazardous waste generated in Illinois have a USEPA and a IEPA I.D. Number. Obtain this information from Appendix B, the facility or from your manifest copy.

FACILITY USEPA I.D NUMBER (41–52): | I | L | N | D | 0 | 1 | 0 | 1 | 0 | 6 | 4 | 6 | 9 | 5 | 0 |

FACILITY IEPA I.D. NUMBER (53–62): | 9 | 1 | 8 | 1 | 0 | 9 | 7 | 0 | 0 | 1 | 2 |

Titan Oil/MetalWorks Lubricants — FACILITY NAME

(317) 632-3613 — A/C PHONE

1509 South Senate — ADDRESS (where waste was managed)

Indianapolis, — CITY

IN — STATE

46225 — ZIP

LINE NO.	DESCRIPTION OF WASTE	WASTE TYPE (67–68)	RCRA HAZARDOUS WASTE CODE (69–76, 77–84)	AMOUNT (gals. only) (85–93)	DENSITY (lbs./gal) (94–96)	ORIGIN (132)
1 (66)	Waste Corrosive Liquid N.O.S. UN1760	1 0	D 0 0 2	1 2 3 4 5 2	8 . 5	1
2 (66)					.	
3 (66)					.	
4 (66)					.	
5 (66)					.	
6 (66)					.	
7 (66)					.	
8 (66)					.	

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1989 GENERATOR ANNUAL HAZARDOUS WASTE REPORT

FOR AGENCY USE | L | P | H | W | C | (1–5) | CARD | 5 | 0 | (6–7) | TRANS | A | (8) | 0 | 2 | 2 | 8 | 9 | 0 | (9–14)

GENERATOR USEPA I.D. NUMBER (18–29): I | L | D | 0 | 0 | 5 | 4 | 5 | 6 | 4 | 3 | 9

GENERATOR IEPA I.D. NUMBER (30–39): 0 | 3 | 1 | 6 | 5 | 0 | 0 | 0 | 0 | 3

Complete one of these pages for each Facility utilized during the year. All facilities in or out of state receiving hazardous waste generated in Illinois have a USEPA and a IEPA I.D. Number. Obtain this information from Appendix B, the facility or from your manifest copy.

FACILITY USEPA I.D NUMBER (41–52): I | D | 0 | 1 | 4 | 8 | 4 | 1 | 5 | 6 | 6 | 5

FACILITY IEPA I.D. NUMBER (53–62): 9 | 3 | 9 | 0 | 9 | 3 | 0 | 0 | 0 | 1

Ross Incineration — FACILITY NAME

(216) 748-2171 — A/C PHONE

394 Giles Road — ADDRESS (where waste was managed)

Grafton — CITY

OH — STATE

44044 — ZIP

LINE NO.	DESCRIPTION OF WASTE	WASTE TYPE	RCRA HAZARDOUS WASTE CODE	AMOUNT (gals. only)	DENSITY (lbs./gal)	ORIGIN	M CT
1	Phthalic Anhydride N.O.S. NA9188	1 4	D 0 1 9 0	8 2 0 0	1 2 . 8	1	0
2							
3							
4							
5							
6							
7							
8							

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1989 GENERATOR ANNUAL HAZARDOUS WASTE REPORT

FOR AGENCY USE | L | P | H | W | C | (1–5) | CARD | 5 | 0 | (6–7) | TRANS | A | (8) | 0 | 2 | 2 | 8 | 9 | 0 | (9–14)

GENERATOR USEPA I.D. NUMBER (18–29): | I | L | D | 0 | 0 | 5 | 4 | 5 | 6 | 4 | 3 | 9 |

GENERATOR IEPA I.D. NUMBER (30–39): | 0 | 3 | 1 | 6 | 5 | 0 | 0 | 0 | 0 | 3 |

Complete one of these pages for each facility utilized during the year. All facilities in or out of state receiving hazardous waste generated in Illinois have a USEPA and a IEPA I.D. Number. Obtain this information from Appendix B, the facility or from your manifest copy.

FACILITY USEPA I.D NUMBER (41–52): | I | L | D | 0 | 0 | 0 | 6 | 0 | 8 | 4 | 7 | 1 |

FACILITY IEPA I.D. NUMBER (53–62): | 0 | 3 | 1 | 6 | 0 | 0 | 0 | 0 | 5 | 1 |

Clean Harbors — FACILITY NAME

(312) 646-6202 — A/C PHONE

11800 S. Stony Island Ave. — ADDRESS (where waste was managed)

Chicago — CITY

IL — STATE

60617 — ZIP

LINE NO	DESCRIPTION OF WASTE	WASTE TYPE (67–68)	RCRA HAZARDOUS WASTE CODE (69–72, 73–76, 77–80, 81–84)	AMOUNT (gals. only) (85–93)	DENSITY (lbs./gal) (94–96)	ORIGIN (132)
1 (56)	Waste Corrosive Liquid N.O.S. UN1760	0 9	D 0 0 2	3 5 5 0	8 . 5	1
2 (56)					.	
3 (56)					.	
4 (56)					.	
5 (56)					.	
6 (56)					.	
7 (56)					.	
8 (56)					.	

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1989 GENERATOR ANNUAL HAZARDOUS WASTE REPORT

FOR AGENCY USE | L | P | H | W | C | (1–5) | CARD | 5 | 0 | (6–7) | TRANS | A | (8) | 0 | 2 | 2 | 8 | 9 | 0 | (9–14)

GENERATOR USEPA I.D. NUMBER (18–29): I | L | D | 0 | 0 | 5 | 4 | 5 | 6 | 4 | 3 | 9

GENERATOR IEPA I.D. NUMBER (30–39): 0 | 3 | 1 | 6 | 5 | 0 | 0 | 0 | 0 | 3

Complete one of these pages for each Facility utilized during the year. All facilities in or out of state receiving hazardous waste generated in Illinois have a USEPA and a IEPA I.D. Number. Obtain this information from Appendix B, the facility or from your manifest copy.

FACILITY USEPA I.D NUMBER (41–52): M | A | D | 9 | 8 | 0 | 5 | 2 | 3 | 2 | 0 | 3

FACILITY IEPA I.D. NUMBER (53–62): 9 | 2 | 5 | 0 | 1 | 7 | 5 | 0 | 8 | 9

Clean Harbors of Natick, Inc. — FACILITY NAME

(508) 655-8863 — A/C PHONE

10 Mercer Road — ADDRESS (where waste was managed)

Natick — CITY

MA — STATE

01760 — ZIP

LINE NO.	DESCRIPTION OF WASTE	WASTE TYPE (67–68)	RCRA HAZARDOUS WASTE CODE (69–72, 73–76, 77–80, 81–84)	AMOUNT (gals. only) (85–93)	DENSITY (lbs./gal) (94–96)	ORIGIN (132)
1 (66)	Laboratory Packs Listed & Characteristic Lab Chemicals	1 7	D 0 0 1 D 0 0 2	4 8 6	8 . 1	1
2 (66)					.	
3 (66)					.	
4 (66)					.	
5 (66)					.	
6 (66)					.	
7 (66)					.	
8 (66)					.	

The Sherwin-Williams Company
11541 S. Champlain Ave.
Chicago, Illinois 60628
Phone (312) 821-3000

May 15, 1990

Illinois Environmental Protection Agency
Division of Land Pollution Control
Compliance Monitoring Section
P. O. Box 19276
Springfield, Illinois 62794-9276

Attn: Mr. Eugene P. Theios

Dear Mr. Theios:

Enclosed please find additions to our February 15, 1990 Hazardous Waste Report which were inadvertently omitted. These pages, 16 through 18, are for the Sherwin-Williams Emulsion Plant in Chicago, Illinois.

Sincerely,

Robert C. Martin
Director/Environmental Services

mg

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1989 GENERATOR ANNUAL HAZARDOUS WASTE REPORT

FOR AGENCY USE | L | P | H | W | C | (1–5) | CARD | 5 | 0 | (6–7) | TRANS | A | (8) | 0 | 2 | 2 | 8 | 9 | 0 | (9–14)

GENERATOR USEPA I.D. NUMBER (18–29): I L D 0 0 5 4 5 6 4 3 9

GENERATOR IEPA I.D. NUMBER (30–39): 0 3 1 6 5 0 0 0 0 3

Complete one of these pages for each Facility utilized during the year. All facilities in or out of state receiving hazardous waste generated in Illinois have a USEPA and a IEPA I.D. Number. Obtain this information from Appendix B, the facility or from your m... ...copy.

FACILITY USEPA I.D NUMBER (41–52): K Y D 0 5 3 3 4 8 1 0 8

FACILITY IEPA I.D. NUMBER (53–62): 9 2 1 1 0 3 0 0 0 1

SAFETY KLEEN CORP. — FACILITY NAME

(502) 845-2453 — A/C PHONE

STATE HWY. 146 — ADDRESS (where waste was managed)

NEW CASTLE — CITY

KY — STATE

40050 — ZIP

LINE NO.	DESCRIPTION OF WASTE	WASTE TYPE (67–68)	RCRA HAZARDOUS WASTE CODE (69–76, 77–80, 81–84)	AMOUNT (gals. only) (85–93)	DENSITY (lbs./gal) (94–96)	ORIGIN (132)	M C
1 (66)	WASTE PAINT/CAUSTIC WASH N.O.S. UN1993	0 7	D 0 0 1	2 0 4 7	8 . 5	1	0
2 (66)					.		
3 (66)					.		
4 (66)					.		
5 (66)					.		
6 (66)					.		
7 (66)					.		
8 (66)					.		

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1989 GENERATOR ANNUAL HAZARDOUS WASTE REPORT

FOR AGENCY USE | L | P | H | W | C | (1–5) | CARD | 5 | 0 | (6–7) | TRANS | A | (8) | 0 | 2 | 2 | 8 | 9 | 0 | (9–14)

GENERATOR USEPA I.D. NUMBER (18–29): I L D 0 0 5 4 5 6 4 3 9

GENERATOR IEPA I.D. NUMBER (30–39): 0 3 1 6 5 0 0 0 0 3

Complete one of these pages for each Facility utilized during the year. All facilities in or out of state receiving hazardous waste generated in Illinois have a USEPA and a IEPA I.D. Number. Obtain this information from Appendix B, the facility or from your manifest copy.

FACILITY USEPA I.D NUMBER (41–52): I L D 9 8 0 6 1 3 9 1 3

FACILITY IEPA I.D. NUMBER (53–62): 0 3 1 0 6 9 0 0 0 6

SAFETY-KLEEN CORP. — FACILITY NAME

(312) 849-4850 — A/C PHONE

633 E. 138th ST. — ADDRESS (where waste was managed)

DOLTON — CITY

IL — STATE

60419 — ZIP

LINE NO.	DESCRIPTION OF WASTE	WASTE TYPE	RCRA HAZARDOUS WASTE CODE	AMOUNT (gals. only)	DENSITY (lbs./gal)	ORIGIN	MC
1	WASTE PAINT/CAUSTIC WASH N.O.S. UN1993	0 7	D 0 0 1	6 0 5	8 . 5	1	0
2							
3							
4							
5							
6							
7							
8							

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1989 GENERATOR ANNUAL HAZARDOUS WASTE REPORT

FOR AGENCY USE | L | P | H | W | C | (1–5) | CARD | 5 | 0 | (6–7) | TRANS | A | (8) | 0 | 2 | 2 | 8 | 9 | 0 | (9–14)

GENERATOR USEPA I.D. NUMBER (18–29): I | L | D | 0 | 0 | 5 | 4 | 5 | 6 | 4 | 3 | 9

GENERATOR IEPA I.D. NUMBER (30–38): 0 | 3 | 1 | 6 | 5 | 0 | 0 | 0 | 0 | 3

Complete one of these pages for each Facility utilized during the year. All facilities in or out of state receiving hazardous waste generated in Illinois have a USEPA and a IEPA I.D. Number. Obtain this information from Appendix B, the facility or from your manifest copy.

FACILITY USEPA I.D NUMBER (41–52): I | N | D | 0 | 0 | 0 | 7 | 1 | 4 | 4 | 2 | 8

FACILITY IEPA I.D. NUMBER (53–62): 9 | 1 | 8 | 1 | 2 | 7 | 9 | 4 | 6 | 9

SAFETY KLEEN CORP. — FACILITY NAME

(219) 763-4554 — A/C PHONE

6050 EAGLE AVE. — ADDRESS (where waste was managed)

PORTAGE — CITY

IN — STATE

46368 — ZIP

LINE NO.	DESCRIPTION OF WASTE	WASTE TYPE (67–68)	RCRA HAZARDOUS WASTE CODE (69–72, 73–76, 77–80, 81–84)	AMOUNT (gals. only) (85–93)	DENSITY (lbs./gal) (94–96)	ORIGIN (132)	MC CT (133)
1 (66)	WASTE PETROLEUM NAPHTHA LIQUID AUTOMOTIVE CLEANER	0 5	D 0 0 1	3 7	7 . 0	1	0
2 (66)					.		
3 (66)					.		
4 (66)					.		
5 (66)					.		
6 (66)					.		
7 (66)					.		
8 (66)					.		

APPENDIX X

1989

The Sherwin-Williams Company
11541 S. Champlain Ave.
Chicago, Illinois 60628-5795
Phone: (312) 821-3000

March 6, 1989

Illinois Environmental Protection Agency
Division of Land Pollution Control
Compliance Monitoring Section
2200 Churchhill Road
Springfield, IL 62706

ATTN: Mr. Eugene P. Theios

Dear Mr. Theios:

Enclosed, please find the original and one photocopy of the 1988 Hazardous Waste Generator Report for The Sherwin-Williams Chemical Coatings Division in Chicago, Illinois.

Page Ten (10) of the report does not have a facility IEPA I.D. number for Safety-Kleen Envirosystems in Clarksville, Missouri. Ms. Dana Curtis of your office advised us to submit the report without the number and that one would be assigned. The permitted name of the facility is Dundee Cement/Safety-Kleen Envirosystems.

Robert C. Martin
Director/Environmental Services

mg

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1988 GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For Agency use |L|P|H|W|C| CARD |2|0| TRANS |A| |0|2|/|2|8|/|8|9|

GENERATOR USEPA I.D. NUMBER — ILD 005 456 439

GENERATOR IEPA I.D. NUMBER — 031 65000 03

GENERATOR COMPANY N: GENERAL MANAGER
SHERWIN WILLIAMS CO

MAILING ADDRESS: 11541 S CHAMPLAIN AVE
CHICAGO IL 60628

LOCATION WASTE GENERATED: 11541 So. Champlain Ave., Chicago, 60628
STREET CITY ZIP

CONTACT PERSON: Robert C. Martin (312) 821-3102
NAME A/C PHONE

GENERATOR SIC CODE |2|8|5|1|

NON-REGULATED STATUS If your company was not regulated during 1988, circle the numeric code (1-5) that describes your non-regulated status during the entire year AND circle the code for the time period this status is expected to apply (6-8). Sign and date this form and attach comment page before mailing.

a. 1 NO HAZARDOUS WASTE SHIPPED OFF-SITE

2 SMALL QUANTITY GENERATOR (Did not generate more than 1000 kg of hazardous waste (or 1 Kg acutely hazardous waste) in any month or accumulate 6000 kg hazardous waste for more than 180 days or more than 270 days for waste transported to a facility over 200 miles away.)

3 FARMING OR OTHER OPERATIONS EXEMPT UNDER 35 Ill. Adm. Code 721.104

4 EXEMPT UNDER 35 Ill. Adm. Code 721.106

5 CLOSED (Prior to 1/1/88) and no waste was shipped off-site

b. 6 FOR 1988 ONLY, explain in comment section

7 PERMANENTLY, explain in comment section

8 OTHER, explain in comment section

REGULATED STATUS If your company does not qualify for non-regulated status it is regulated for 1988. You must complete the entire report including Page 1 (Generator Information), Page 2 (Comments), Page 3 (Waste Minimization), Page 4 (Transportation Services) and Page(s) 5, 6, 7, etc. (Facility Information).

This Agency is authorized to require this information under Illinois Revised Statutes, 1981, Chapter 111-1/2, Sections 1004 and 1021(f)(2). Disclosure of this information is required. Failure to do so may result in a civil penalty up to $25,000 for each day the failure continues, a fine up to $1,000,000.00 and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

CERTIFICATION I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Donald T. Rehor (signature)

DONALD T. REHOR	V.P./ENGINEERING & ENVIRONMENTAL SERVICES		3-6-89
PRINT/TYPE NAME	TITLE	SIGNATURE	DATE

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1988 GENERATOR ANNUAL HAZARDOUS WASTE REPORT

GENERATOR USEPA I.D. NUMBER IL

I	L	0	1	0	1	5	1	5	1	6	1	4	1	3	1	9

GENERATOR IEPA I.D. NUMBER

0	3	1	6	5	0	0	0	0	3

COMMENTS:

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1988 GENERATOR ANNUAL HAZARDOUS WASTE REPORT

GENERATOR USEPA I.D. NUMBER	GENERATOR IEPA I.D
IL D 0 0 5 4 5 6 4 3 9	0 3 1 6 5 0 0 0 0 3

WASTE MINIMIZATION:

a. Efforts taken to implement waste minimization include: (Indicate all that apply)

YES (NO)	Did you create or expand a source reduction or recycling program in 1988?
(YES) NO	Do you have a written policy outlining goals, objectives, and methods for source reduction?
YES (NO)	Do you have an employee training program or provide incentives to identify and implement source reduction and recycling opportunities and activities?
(YES) NO	Did you conduct a source reduction and/or recycling opportunity assessment or audit in 1988?
YES (NO) Have USEPA documents	Have you requested or received technical information from the Illinois Environmental Agency on source reduction and/or recycling practices?
(YES) NO	Would you be interested in having technical information sent to you?

Due to waste minimization, what percent reduction was achieved (over that which was achieved in 1987) in 1988? 0 %

b. What factors have delayed or prevented implementation of source reduction and/or recycling of your wastes? (Check all that apply)

[ ] 1. Insufficient capital to install new equipment or to implement new practices.

[ ] 2. Lack of technical information on source reduction and/or recycling techniques.

[ ] 3. Source reduction and/or recycling is not economically feasible.

[ ] 4. Product quality might decline as a result of either source reduction and/or recycling.

[X] 5. Technical limitations.

[ ] 6. Permitting burdens.

[ ] 7. Unable to identify a market for recyclable materials.

[ ] 8. Other, explain: _____

_____

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1988 GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For Agency use | L P H W C | (1–5) | CARD | 6 0 | (6–7) | TRANS | A | (8) | 0 2/2 8/8 9 | (9–14)

GENERATOR USEPA I.D. NUMBER (18–29): I L D 0 0 5 4 5 6 4 3 9

GENERATOR IEPA I.D. NUMBER (30–39): 0 3 1 1 6 5 0 0 0 0 3

LIST OF TRANSPORTATION SERVICES (HAULERS) USED: *List each hauler only once regardless of the number of individual waste shipments.*

LINE NO. (61–64)	TRANSPORTER NAME/ ADDRESS	TRANSPORTER USEPA I.D. NO. (95–106)	TRANSPORTER ILLINOIS EPA I.D. NO. (107–11)
0001	MR. FRANK, INC., SOUTH HOLLAND, IL 60473	I L D 0 6 9 5 0 6 1 6 0	0 0 7 5
0002	CHEMICAL SERVICES CORP. CRESTWOOD, IL 60445	I L D 9 8 0 7 0 1 1 6 0	1 3 0
0003	HERITAGE TRANSPORT, INDIANAPOLIS, IN 46231	I N D 0 5 8 4 8 4 1 1 4	1 5 5
0004	SAFETY KLEEN, PORTAGE, IN 46368	I N D 0 0 0 7 1 4 4 2 8	1 1 2
0005	LWD, INC., CALVERT CITY, KY 42029	K Y D 0 8 8 4 3 8 8 1 7	0 5 7
0006	GREAT LAKES, LYNWOOD, IL 60411	I L T 0 0 6 0 8 3 6 4	0 0 1
0007	APTUS, COFFEYVILLE, KS 67337	M N D 9 8 0 7 9 1 3 2 1	1 4 8
0008	AQUA-TECH, PORT WASHINGTON, WI 53074	W I D 0 6 6 8 8 8 0 1 7	0 9 7
0009	SCHNEIDER TRUCK LINES, GREENBAY, WI 54306	W I D 9 8 0 9 0 4 7 4 2	1 5 0
0010	SET LIQUID WASTE SYSTEMS, INC., WHEELING, IL 60090	I L D 9 8 1 9 5 7 2 3 6	1 2 5
0011	PETROCHEM SERVICES, INC., LEMONT, IL 60439	I L D 0 8 5 3 4 9 2 6 4	0 1 5
0012	GROEN BROS., BLUE ISLAND, IL 60406	I L D 0 6 8 5 9 0 2 6 9	0 0 5

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1988 GENERATOR ANNUAL HAZARDOUS WASTE REPORT

FOR AGENCY USE | L | P | H | W | C | (1–5) CARD | 5 | 0 | (6–7) TRANS | A | (8) | 0 | 2 | 1 | 2 | 8 | 9 | (9–14)

GENERATOR USEPA I.D. NUMBER: I L D 0 0 5 4 5 6 4 3 9 (18–29)

GENERATOR IEPA I.D. NUMBER: 0 3 1 6 5 0 0 0 0 3 (30–39)

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FACILITY USEPA I.D NUMBER: I L D 0 0 0 6 0 8 4 7 1 (41–52)

FACILITY IEPA I.D. NUMBER: 0 3 1 6 0 0 0 0 5 1 (53–62)

CHEM CLEAR — FACILITY NAME

(312) 646-6202 — A/C PHONE

11800 S. STONEY ISLAND — ADDRESS

CHICAGO — CITY

IL — STATE

60617 — ZIP

LINE NO.	DESCRIPTION OF WASTE / MEDIUM	USDOT CODE	RCRA HAZARDOUS WASTE CODE	AMOUNT (gals. only)	DENSITY (lbs./gal)	Frequency Generated
0 0 0 1	WASTEWATER		D 0 0 2	1 0 0 0	8 . 3	One-Time
(63–66)	Soil Solid (Liquid) Lab Pack Sludge	(67–68)	(69–72, 73–76, 77–80, 81–84)	(85–93)	(94–96)	Recurrent
0 0 0 2						One-Time
(63–66)	Soil Solid Liquid Lab Pack Sludge	(67–68)	(69–72, 73–76, 77–80, 81–84)	(85–93)	(94–96)	Recurrent
0 0 0 3						One-Time
(63–66)	Soil Solid Liquid Lab Pack Sludge	(67–68)	(69–72, 73–76, 77–80, 81–84)	(85–93)	(94–96)	Recurrent
0 0 0 4						One-Time
(63–66)	Soil Solid Liquid Lab Pack Sludge	(67–68)	(69–72, 73–76, 77–80, 81–84)	(85–93)	(94–96)	Recurrent
0 0 0 5						One-Time
(63–66)	Soil Solid Liquid Lab Pack Sludge	(67–68)	(69–72, 73–76, 77–80, 81–84)	(85–93)	(94–96)	Recurrent
0 0 0 6						One-Time
(63–66)	Soil Solid Liquid Lab Pack Sludge	(67–68)	(69–72, 73–76, 77–80, 81–84)	(85–93)	(94–96)	Recurrent
0 0 0 7						One-Time
(63–66)	Soil Solid Liquid Lab Pack Sludge	(67–68)	(69–72, 73–76, 77–80, 81–84)	(85–93)	(94–96)	Recurrent
0 0 0 8						One-Time
(63–66)	Soil Solid Liquid Lab Pack Sludge	(67–68)	(69–72, 73–76, 77–80, 81–84)	(85–93)	(94–96)	Recurrent

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1988 GENERATOR ANNUAL HAZARDOUS WASTE REPORT

FOR AGENCY USE | L | P | H | W | C | (1–5) | CARD | 5 | 0 | (6–7) | TRANS | A | (8) | 0 | 2 | / | 2 | 8 | / | 8 | 9 | (9–14)

GENERATOR USEPA I.D. NUMBER (18–29): I L D 0 0 5 4 5 6 4 3 9

GENERATOR IEPA I.D. NUMBER (30–39): 0 3 1 6 5 0 0 0 0 3

Complete one of these pages for each Facility utilized during the year. All facilities in or out of state receiving hazardous waste generated in Illinois have a USEPA and a IEPA I.D. Number. Obtain this information from the facility or from your manifest.

FACILITY USEPA I.D NUMBER (41–52): I N D 0 0 0 7 1 4 4 2 8

FACILITY IEPA I.D. NUMBER (53–62): 9 1 8 1 2 7 9 4 6 9

SAFETY-KLEEN — FACILITY NAME

(219) 763-4554 — A/C PHONE

6050 EAGLE AVE. — ADDRESS

PORTAGE — CITY

IN — STATE

46368 — ZIP

LINE NO.	DESCRIPTION OF WASTE / MEDIUM	USDOT CODE	RCRA HAZARDOUS WASTE CODE	AMOUNT (gals. only)	DENSITY (lbs./gal)	Frequency Generated
0001	WASTE PETROLEUM NAPTHA UN1255		D001	90	7.0	One-Time
(63–66)	Soil Solid (Liquid) Lab Pack Sludge	(67–68)	(69–72, 73–76, 77–80, 81–84)	(85–93)	(94–96)	(Recurrent)
0002						One-Time
(63–66)	Soil Solid Liquid Lab Pack Sludge	(67–68)	(69–72, 73–76, 77–80, 81–84)	(85–93)	(94–96)	Recurrent
0003						One-Time
(63–66)	Soil Solid Liquid Lab Pack Sludge	(67–68)	(69–72, 73–76, 77–80, 81–84)	(85–93)	(94–96)	Recurrent
0004						One-Time
(63–66)	Soil Solid Liquid Lab Pack Sludge	(67–68)	(69–72, 73–76, 77–80, 81–84)	(85–93)	(94–96)	Recurrent
0005						One-Time
(63–66)	Soil Solid Liquid Lab Pack Sludge	(67–68)	(69–72, 73–76, 77–80, 81–84)	(85–93)	(94–96)	Recurrent
0006						One-Time
(63–66)	Soil Solid Liquid Lab Pack Sludge	(67–68)	(69–72, 73–76, 77–80, 81–84)	(85–93)	(94–96)	Recurrent
0007						One-Time
(63–66)	Soil Solid Liquid Lab Pack Sludge	(67–68)	(69–72, 73–76, 77–80, 81–84)	(85–93)	(94–96)	Recurrent
0008						One-Time
(63–66)	Soil Solid Liquid Lab Pack Sludge	(67–68)	(69–72, 73–76, 77–80, 81–84)	(85–93)	(94–96)	Recurrent

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1988 GENERATOR ANNUAL HAZARDOUS WASTE REPORT

FOR AGENCY USE | L | P | H | W | C | (1–5) CARD | 5 | 0 | (6–7) TRANS | A | (8) | 0 | 2 | / | 2 | 8 | / | 8 | 9 | (9–14)

GENERATOR USEPA I.D. NUMBER (18–29): I L D 0 0 5 4 5 6 4 3 9

GENERATOR IEPA I.D. NUMBER (30–39): 0 3 1 6 5 0 0 0 0 3

Complete one of these pages for each Facility utilized during the year. All facilities in or out of state receiving hazardous waste generated in Illinois have a USEPA and a IEPA I.D. Number. Obtain this information from the facility or from your manifest.

FACILITY USEPA I.D NUMBER (41–52): I L D 0 8 5 3 4 9 2 6 4

FACILITY IEPA I.D. NUMBER (53–62): 0 3 1 1 6 2 0 0 0 7

FACILITY NAME _____ A/C PHONE ( )

ADDRESS _____ CITY _____ STATE _____ ZIP _____

LINE NO.	DESCRIPTION OF WASTE / MEDIUM	USDOT CODE	RCRA HAZARDOUS WASTE CODE	AMOUNT (gals. only)	DENSITY (lbs./gal)	Frequency Generated
0 0 0 1	WASTE SOLVENT N.O.S. UN1993		F 0 0 5	9 8 0 0	8 . 0	One-Time
(63–66)	Soil Solid (Liquid) Lab Pack Sludge	(67–68)	(69–72 / 73–76 / 77–80 / 81–84)	(85–93)	(94–96)	Recurrent
0 0 0 2	STILL BOTTOMS N.O.S. UN1993		F 0 0 5	4 5 8 2 6 1	8 . 1	One-Time
(63–66)	Soil Solid (Liquid) Lab Pack Sludge	(67–68)	(69–72 / 73–76 / 77–80 / 81–84)	(85–93)	(94–96)	Recurrent
0 0 0 3	WASTE PAINT N.O.S. UN1993		D 0 0 1	9 6 8 6 6	8 . 1	One-Time
(63–66)	Soil Solid (Liquid) Lab Pack Sludge	(67–68)	(69–72 / 73–76 / 77–80 / 81–84)	(85–93)	(94–96)	Recurrent
0 0 0 4					.	One-Time
(63–66)	Soil Solid Liquid Lab Pack Sludge	(67–68)	(69–72 / 73–76 / 77–80 / 81–84)	(85–93)	(94–96)	Recurrent
0 0 0 5					.	One-Time
(63–66)	Soil Solid Liquid Lab Pack Sludge	(67–68)	(69–72 / 73–76 / 77–80 / 81–84)	(85–93)	(94–96)	Recurrent
0 0 0 6					.	One-Time
(63–66)	Soil Solid Liquid Lab Pack Sludge	(67–68)	(69–72 / 73–76 / 77–80 / 81–84)	(85–93)	(94–96)	Recurrent
0 0 0 7					.	One-Time
(63–66)	Soil Solid Liquid Lab Pack Sludge	(67–68)	(69–72 / 73–76 / 77–80 / 81–84)	(85–93)	(94–96)	Recurrent
0 0 0 8					.	One-Time
(63–66)	Soil Solid Liquid Lab Pack Sludge	(67–68)	(69–72 / 73–76 / 77–80 / 81–84)	(85–93)	(94–96)	Recurrent

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1988 GENERATOR ANNUAL HAZARDOUS WASTE REPORT

FOR AGENCY USE |L|P|H|W|C| (1–5) CARD |5|0| (6–7) TRANS |A| (8) |0|2|/|2|8|/|8|9| (9–14)

GENERATOR USEPA I.D. NUMBER (18–29): |I|L|D|0|0|5|4|5|6|4|3|9|

GENERATOR IEPA I.D. NUMBER (30–39): |0|3|1|6|5|0|0|0|0|3|

Complete one of these pages for each Facility utilized during the year. All facilities in or out of state receiving hazardous waste generated in Illinois have a USEPA and a IEPA I.D. Number. Obtain this information from the facility or from your manifest.

FACILITY USEPA I.D NUMBER (41–52): |I|N|D|9|8|0|5|9|0|9|4|7|

FACILITY IEPA I.D. NUMBER (53–62): |9|1|8|1|4|1|0|0|0|4|

INDUSTRIAL FUELS & RESOURCES — FACILITY NAME

(219) 234-0441 — A/C PHONE

604 S. SCOTT ST. — ADDRESS

SOUTH BEND, — CITY

IN — STATE

46624 — ZIP

LINE NO.	DESCRIPTION OF WASTE / MEDIUM	USDOT CODE (67–68)	RCRA HAZARDOUS WASTE CODE (69–72, 73–76, 77–80, 81–84)	AMOUNT (gals. only) (85–93)	DENSITY (lbs./gal) (94–96)	Frequency Generated
0001	*UN1993 WASTE PAINT FLAMMABLE N.O.S.*		*D001*	*23800*	*8.1*	One-Time
(63–66)	Soil, Solid, (Liquid), Lab Pack, Sludge					(Recurrent)
0002	*WASTE SOLVENT N.O.S. UN1993*		*F005*	*29100*	*8.0*	One-Time
	Soil, Solid, (Liquid), Lab Pack, Sludge					(Recurrent)
0003	*STILL BOTTOMS N.O.S. UN1993*		*F005*	*37700*	*8.1*	One-Time
	Soil, Solid, (Liquid), Lab Pack, Sludge					(Recurrent)
0004					.	One-Time
	Soil, Solid, Liquid, Lab Pack, Sludge					Recurrent
0005					.	One-Time
	Soil, Solid, Liquid, Lab Pack, Sludge					Recurrent
0006					.	One-Time
	Soil, Solid, Liquid, Lab Pack, Sludge					Recurrent
0007					.	One-Time
	Soil, Solid, Liquid, Lab Pack, Sludge					Recurrent
0008					.	One-Time
	Soil, Solid, Liquid, Lab Pack, Sludge					Recurrent

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1988 GENERATOR ANNUAL HAZARDOUS WASTE REPORT

FOR AGENCY USE L P H W C (1–5) CARD 5 0 (6–7) TRANS A (8) 0 2 / 2 8 / 8 9 (9–14)

GENERATOR USEPA I.D. NUMBER (18–29): 1 L D 0 0 5 4 5 6 4 3 9

GENERATOR IEPA I.D. NUMBER (30–39): 0 3 1 6 5 0 0 0 0 3

Complete one of these pages for each Facility utilized during the year. All facilities in or out of state receiving hazardous waste generated in Illinois have a USEPA and a IEPA I.D. Number. Obtain this information from the facility or from your manifest.

FACILITY USEPA I.D NUMBER (41–52): K Y D 0 8 8 4 3 8 8 1 7

FACILITY IEPA I.D. NUMBER (53–62): 9 2 1 1 5 7 0 0 0 4

L.W.D. INC. — FACILITY NAME

(502) 395-8313 — A/C PHONE

P.O.BOX 327 — ADDRESS

CALVERT CITY — CITY

KY — STATE

42029 — ZIP

LINE NO.	DESCRIPTION OF WASTE / MEDIUM	USDOT CODE	RCRA HAZARDOUS WASTE CODE	AMOUNT (gals. only)	DENSITY (lbs./gal)	Frequency Generated
0001	WASTE FLAMMABLE N.O.S. UN1993		D001	0725	12.0	One-Time
(63–66)	Soil (Solid) Liquid Lab Pack Sludge	(67–68)	(69–72, 73–76, 77–80, 81–84)	(85–93)	(94–96)	Recurrent
0002					.	One-Time
(63–66)	Soil Solid Liquid Lab Pack Sludge	(67–68)	(69–72, 73–76, 77–80, 81–84)	(85–93)	(94–96)	Recurrent
0003					.	One-Time
(63–66)	Soil Solid Liquid Lab Pack Sludge	(67–68)	(69–72, 73–76, 77–80, 81–84)	(85–93)	(94–96)	Recurrent
0004					.	One-Time
(63–66)	Soil Solid Liquid Lab Pack Sludge	(67–68)	(69–72, 73–76, 77–80, 81–84)	(85–93)	(94–96)	Recurrent
0005					.	One-Time
(63–66)	Soil Solid Liquid Lab Pack Sludge	(67–68)	(69–72, 73–76, 77–80, 81–84)	(85–93)	(94–96)	Recurrent
0006					.	One-Time
(63–66)	Soil Solid Liquid Lab Pack Sludge	(67–68)	(69–72, 73–76, 77–80, 81–84)	(85–93)	(94–96)	Recurrent
0007					.	One-Time
(63–66)	Soil Solid Liquid Lab Pack Sludge	(67–68)	(69–72, 73–76, 77–80, 81–84)	(85–93)	(94–96)	Recurrent
0008					.	One-Time
(63–66)	Soil Solid Liquid Lab Pack Sludge	(67–68)	(69–72, 73–76, 77–80, 81–84)	(85–93)	(94–96)	Recurrent

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1988 GENERATOR ANNUAL HAZARDOUS WASTE REPORT

FOR AGENCY USE |L|P|H|W|C| (1–5) CARD |5|0| (6–7) TRANS |A| (8) |0|2|/|2|8|/|8|9| (9–14)

GENERATOR USEPA I.D. NUMBER (18–29): |I|L|D|0|0|5|4|5|6|4|3|9|

GENERATOR IEPA I.D. NUMBER (30–39): |0|3|1|6|5|0|0|0|0|3|

Complete one of these pages for each Facility utilized during the year. All facilities in or out of state receiving hazardous waste generated in Illinois have a USEPA and a IEPA I.D. Number. Obtain this information from the facility or from your manifest.

FACILITY USEPA I.D NUMBER (41–52): |M|O|D|0|2|9|7|2|9|6|8|8|

FACILITY IEPA I.D. NUMBER (53–82):

SAFETY-KLEEN ENVIROSYSTEMS — FACILITY NAME

(314) 242-3551 — A/C PHONE

HIGHWAY 79 NORTH-P.O.BOX 456 — ADDRESS

CLARKSVILLE, — CITY

MO — STATE

63336 — ZIP

LINE NO.	DESCRIPTION OF WASTE / MEDIUM	USDOT CODE	RCRA HAZARDOUS WASTE CODE	AMOUNT (gals. only)	DENSITY (lbs./gal)	Frequency Generated
0001	*UN1993 WASTE STILL BOTTOMS N.O.S.*		*F005*	*5362.6*	*8.1*	One-Time
	Soil Solid (Liquid) Lab Pack Sludge					(Recurrent)
0002	Soil Solid Liquid Lab Pack Sludge					One-Time / Recurrent
0003	Soil Solid Liquid Lab Pack Sludge					One-Time / Recurrent
0004	Soil Solid Liquid Lab Pack Sludge					One-Time / Recurrent
0005	Soil Solid Liquid Lab Pack Sludge					One-Time / Recurrent
0006	Soil Solid Liquid Lab Pack Sludge					One-Time / Recurrent
0007	Soil Solid Liquid Lab Pack Sludge					One-Time / Recurrent
0008	Soil Solid Liquid Lab Pack Sludge					One-Time / Recurrent

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1988 GENERATOR ANNUAL HAZARDOUS WASTE REPORT

FOR AGENCY USE |L|P|H|W|C| (1–5) CARD |5|0| (6–7) TRANS |A| (8) |0|2|/|2|8|/|8|9| (9–14)

GENERATOR USEPA I.D. NUMBER (18–29): |I|L|D|0|0|5|4|5|6|4|3|9|

GENERATOR IEPA I.D. NUMBER (30–39): |0|3|1|6|5|0|0|0|0|3|

Complete one of these pages for each Facility utilized during the year. All facilities in or out of state receiving hazardous waste generated in Illinois have a USEPA and a IEPA I.D. Number. Obtain this information from the facility or from your manifest.

FACILITY USEPA I.D NUMBER (41–52): |S|C|D|0|5|8|7|5|4|7|8|9|

FACILITY IEPA I.D. NUMBER (53–62): |9|4|5|0|8|3|3|0|0|1|

GRACE LABORATORIES — FACILITY NAME

(803) 877-1048 — A/C PHONE

HIGHWAY 290 AT ROBINSON RD. — ADDRESS

GREER — CITY

SC — STATE

29651 — ZIP

LINE NO.	DESCRIPTION OF WASTE / MEDIUM	USDOT CODE	RCRA HAZARDOUS WASTE CODE	AMOUNT (gals. only)	DENSITY (lbs./gal)	Frequency Generated
0001	*POISON B, N.O.S. UN2810*		*D003*	*50*	*7.7*	(One-Time)
	Soil Solid (Liquid) Lab Pack Sludge					Recurrent
0002	Soil Solid Liquid Lab Pack Sludge					One-Time / Recurrent
0003	Soil Solid Liquid Lab Pack Sludge					One-Time / Recurrent
0004	Soil Solid Liquid Lab Pack Sludge					One-Time / Recurrent
0005	Soil Solid Liquid Lab Pack Sludge					One-Time / Recurrent
0006	Soil Solid Liquid Lab Pack Sludge					One-Time / Recurrent
0007	Soil Solid Liquid Lab Pack Sludge					One-Time / Recurrent
0008	Soil Solid Liquid Lab Pack Sludge					One-Time / Recurrent

APPENDIX XIII

NOV 19 1990

NOV 30 1990

Department of Buildings
121 N. LaSalle Street, 8th Floor
City Hall, Room 800
Chicago, IL 60602

Application for
Flammable Liquids, Corrosive Liquids, Oxidizing Materials, Highly Toxic Materials or Hazardous Chemicals

FILE NO. _____
PERMIT NO. _____
PLAN ..... ☐
INSTALLATION ..... ☐
REMOVAL ..... ☒
SANDFILL ..... ☐
CA 3401 WARD 09
REPAIRS ..... ☐
GLASS ARMOUR TANK ☐

October 22, 1990

Location 11541 S. Champlain Avenue Use of premises _____

Owner Sherwin Williams Company Address 101 Prospect Zip 44115 City Clevelan

Lessee _____ Address _____ Zip _____ City _____

Contractor OHM Corporation Address 1334 Enterprise Zip 60441 City Romeovil

Contractor - Registration Number 341-27-5607 Date Expires March 13, 1991

Phone No. 312/821-3102 Contractor's Phone No. 708/759-9493

Number of tanks 1 Dimensions of tanks _____

Capacity in gals., each tank 1,000 Total capacity in gals., all tanks 1,000

Liquid to be stored Gasoline storage Use of liquid gasoline Flash point <200

Thickness of metal _____ Size of fill pipe _____ Size of vent pipe _____

Is tank below ground? Yes Distance from grade to top of tank _____

Is tank inside of building? No Is tank to be incased in concrete or brick? _____

Is the proposed location within 200 feet of the nearest plot of ground used for a church, school, theatre or hospital? No

Is tank under public way? No Compensation permit no. _____

Remarks

Remove UST

The applicant hereby certifies to the correctness of the above. The application must be signed by the owner or duly authorized agent.

Signature _____
Owner or Agent

Address 1334 Enterprise Drive
Romeoville, IL 60441

THIS IS NOT A PERMIT. Do not start the installation, removal, or sand filling until a permit is issued by the Department of Buildings. Final inspection of installation must be requested for testing and tank must not be covered or filled before such final inspection is made and installation approved.

(over)

This Space for Office Use Only
Site Approved
SCHEDULE OF FEES
Approved for permit
Frontage consents
Zone for

CITY OF CHICAGO
DEPARTMENT OF ZONING
CONFORMS
TO ZONING ORDINANCE
NOV 19 1990
USE OF BLDG. Manufacturing
DESCRIPTION OF WORK
PLAN EXAMINER Antique
ZONING ADMINISTRATOR

M3-3 28-E

OFFICE OF THE ILLINOIS STATE FIRE MARSHAL
Division of Petroleum and Chemical Safety
1035 Stevenson Drive
Springfield, Illinois 62703-4259

Facility # 2000860
Permit #
Approval Date
Approved By

APPLICATION FOR PERMIT TO REMOVE UNDERGROUND STORAGE TANKS FOR PETROLEUM AND HAZARDOUS MATERIALS

be completed in quadruplet and filed with the Division of Petroleum and Chemical Safety 1035 Stevenson Drive, Springfield, Illinois 62703-4259 (217/785-5878) or (217/785-1020)

1) (Owner of tanks) - Corporation, partnership or other business entity:

Sherwin Williams Company
Name
101 Prospect Avenue
Street Address
Cleveland, OH 44115
City State Zip
Robert Martin- 312/821-3102
Contact Person Phone

2) (Facility) - name and address of where tanks are located:

Sherwin Williams
Name
11541 S. Champlain Avenue
Street Address
Chicago, IL 60628 Cook
City State Zip County
Robert Martin 312/821-3102
Contact Person Phone

3) (Contractor) - person, firm or company performing work:

OHM Corporation
Name
1334 Enterprise Drive
Street Address
Romeoville, IL 60441 Will
City State Zip County
708/759-9493 341-27-5607
Phone Registration No.

Facility Registration I.D. Number (if known)

2000860

4) [X] Removal of Tanks:

a) Number and size of tanks being removed: 1 - 1,000 gallon gasoline tank

b) Reason for removal of tanks:

c) If tank is leaking, give ESDA incident number:

d) If tanks contain products other than petroleum products, please indicate here:

e) A written notice of removal of tanks shall be given to the Office of the State Fire Marshal at least 30 days prior to the removal, giving location, number and size of tanks. This application will constitute that 30 day written notice. The 30 day period commences with this application appropriately completed and the fee received in our office.

5) If tanks are not registered complete the following:

a) What products were stored in each tank?

b) Date each tank was last used?

6) Insufficient information supplied for permit review or omission of permit fee is grounds for application rejection. No work is to commence without a granted permit in hand and must be available upon request of inspectors. All work must be done by contractors registered with the State Fire Marshal's Office or by the tank owner only.

7) A permit fee of $100 for each facility must accompany this application. (Checks or money orders are to be made payable to Office of the State Fire Marshal.) [ ] Check [ ] Money Order

8) For each facility, EPA form 7530-1 - Notification of Underground Storage Tanks must be completed and submitted to the Office of the State Fire Marshal after tanks are removed.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that all submitted information is true, accurate and complete.

Name of Authorized Representative: _____ Title: _____

Signature of Authorized Representative: _____ Date: _____

The Office of the State Fire Marshal is requesting information that is necessary to accomplish the statutory purpose outlined in Illinois Revised Statutes, Chapter 127½, Paragraph 9. Disclosure of this information is REQUIRED. Fail to provide any information will result in this form not being processed. This form has been approved by Forms Management Center.

IL 532 0139

Notification for Underground Storage Tanks

ID Number

STATE USE ONLY

Date Received

GENERAL INFORMATION

Notification is required by Federal law for all underground tanks that have been used to store regulated substances since January 1, 1974, that are in the ground as of May 8, 1986, or that are brought into use after May 8, 1986. The information requested is required by Section 9002 of the Resource Conservation and Recovery Act (RCRA), as amended.

The primary purpose of this notification program is to locate and evaluate underground tanks that store or have stored petroleum or hazardous substances. It is expected that the information you provide will be based on reasonably available records, or, in the absence of such records, your knowledge, belief, or recollection.

Who Must Notify? Section 9002 of RCRA, as amended, requires that, unless exempted, owners of underground tanks that store regulated substances must notify designated State or local agencies of the existence of their tanks. Owner means:

(a) in the case of an underground storage tank in use on November 8, 1984, or brought into use after that date, any person who owns an underground storage tank used for the storage, use, or dispensing of regulated substances; and

(b) in the case of any underground storage tank in use before November 8, 1984, but no longer in use on that date, any person who owned such tank immediately before the discontinuation of its use.

What Tanks Are Included? Underground storage tank is defined as any one or combination of tanks that (1) is used to contain an accumulation of "regulated substances," and (2) whose volume (including connected underground pipping) is 10% or more beneath the ground. Some examples are underground tanks storing: 1. gasoline, used oil, or diesel fuel; and 2. industrial solvents, pesticides, herbicides or fumigants.

What Tanks Are Excluded? Tanks removed from the ground are not subject to notification. Other tanks excluded from notification are:

1. farm or residential tanks of 1,100 gallons or less capacity used for storing motor fuel for noncommercial purposes;
2. tanks used for storing heating oil for consumptive use on the premises where stored;
3. septic tanks;
4. pipeline facilities (including gathering lines) regulated under the Natural Pipeline Safety Act of 1968, or the Hazardous Liquid Pipeline Safety Act of 19 which is an intrastate pipeline facility regulated under State laws;
5. surface impoundments, pits, ponds, or lagoons;
6. storm water or waste water collection systems;
7. flow-through process tanks;
8. liquid traps or associated gathering lines directly related to oil or gas productio gathering operations;
9. storage tanks situated in an underground area (such as a basement, cellar, mine working, drift, shaft, or tunnel) if the storage tank is situated upon or abo surface of the floor.

What Substances Are Covered? The notification requirements apply to ground storage tanks that contain regulated substances. This includes any sub defined as hazardous in section 101 (14) of the Comprehensive Environ Response, Compensation and Liability Act of 1980 (CERCLA), with the exceptio those substances regulated as hazardous waste under Subtitle C of RCRA. includes petroleum, e.g., crude oil or any fraction thereof which is liquid at st conditions of temperature and pressure (60 degrees Fahrenheit and 14.7 pou per square inch absolute).

Where To Notify? Completed notification forms should be sent to the a given at the top of this page.

When To Notify? 1. Owners of underground storage tanks in use or that no taken out of operation after January 1, 1974, but still in the ground, must n May 8, 1986. 2. Owners who bring underground storage tanks into use after 1985, must notify within 30 days of bringing the tanks into use.

Penalties: Any owner who knowingly fails to notify or submits false infor shall be subject to a civil penalty not to exceed $10,000 for each tank for notification is not given or for which false information is submitted.

INSTRUCTIONS

Please type or print in ink all items except "signature" in Section V. This form must be completed for each location containing underground storage tanks. If more than 5 tanks are owned at this location, photocopy the reverse side, and staple continuation sheets to this form.

Indicate number of continuation sheets attached: 1

I. OWNER (Section 1)

Owner Name (Corporation, Individual, Public Agency, or Other Entity)
THE SHERWIN WILLIAMS COMPANY

Street Address
101 PROSPECT AVENUE

County

City: CLEVELAND | State: OHIO | ZIP Code: 44115

Area Code: 216 | Phone Number: 566-2480

Type of Owner (Mark all that apply)
- ☐ Current
- ☐ Former
- ☐ State or Local Gov't
- ☐ Federal Gov't (GSA facility I.D. no. _____)
- ☒ Private or Corporate
- ☐ Ownership uncertain

II. LOCATION (Section 2)

(If same as Section 1, mark box here ☐)

Facility Name or Company Site Identifier, as applicable
THE SHERWIN-WILLIAMS COMPANY, RESIN PLANT

Street Address or State Road, as applicable
11541 S. CHAMPLAIN AVENUE

County
COOK

City (nearest): CHICAGO | State: ILLINOIS | ZIP Code: 6062[illegible]

Indicate number of tanks at this location: 9

Mark box here if tank(s) are located on land within an Indian reservation or on other Indian trust lands: ☐

III. CONTACT PERSON AT LOCATION (Section 3)

Name (If same as Section I, mark box here ☐) | Job Title: WILLIAM LUKES - PRODUCTION SUPERVISOR | Area Code: 312 | Phone No.: 821-3302

IV. TYPE OF NOTIFICATION (Section 4)

☐ Mark box here only if this is an amended or subsequent notification for this location.

V. CERTIFICATION (See instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all a documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe submitted information is true, accurate, and complete.

Name and official title of owner or owner's authorized representative: WILLIAM LUKES - PRODUCTION SUPERVISOR

Signature: William Lukes

Date Signed: 11/7/86

Owner Name (from Section I) SHERWIN - WILLIAMS Location (from Section II) CHICAGO Page No. 2 of 3 Pag

VI. DESCRIPTION OF UNDERGROUND STORAGE TANKS (Complete for each tank at this location)

Tank Identification No. (e.g., ABC-123), or Arbitrarily Assigned Sequential Number (e.g., 1,2,3...)		Tank No. 610	Tank No. 611	Tank No. 612	Tank No. 613	Tank No. 614
1. Status of Tank (Mark all that apply ☒)	Currently in Use	☒	☒	☒	☒	☒
	Temporarily Out of Use	☐	☐	☐	☐	☐
	Permanently Out of Use	☐	☐	☐	☐	☐
	Brought into Use after 5/8/86	☐	☐	☐	☐	☐
2. Estimated Age (Years)		12	12	12	12	12
3. Estimated Total Capacity (Gallons)		8000	8000	8000	8000	8000
4. Material of Construction (Mark one ☒)	Steel	☒	☒	☒	☒	☒
	Concrete	☐	☐	☐	☐	☐
	Fiberglass Reinforced Plastic	☐	☐	☐	☐	☐
	Unknown	☐	☐	☐	☐	☐
	Other, Please Specify					
5. Internal Protection (Mark all that apply ☒)	Cathodic Protection	☐	☐	☐	☐	☐
	Interior Lining (e.g., epoxy resins)	☐	☐	☐	☐	☐
	None	☒	☒	☒	☒	☒
	Unknown	☐	☐	☐	☐	☐
	Other, Please Specify					
6. External Protection (Mark all that apply ☒)	Cathodic Protection	☐	☐	☐	☐	☐
	Painted (e.g., asphaltic)	☒	☒	☒	☒	☒
	Fiberglass Reinforced Plastic Coated	☐	☐	☐	☐	☐
	None	☐	☐	☐	☐	☐
	Unknown	☐	☐	☐	☐	☐
	Other, Please Specify					
7. Piping (Mark all that apply ☒)	Bare Steel	☒	☒	☒	☒	☒
	Galvanized Steel	☐	☐	☐	☐	☐
	Fiberglass Reinforced Plastic	☐	☐	☐	☐	☐
	Cathodically Protected	☐	☐	☐	☐	☐
	Unknown	☐	☐	☐	☐	☐
	Other, Please Specify	PAINTED	PAINTED	PAINTED	PAINTED	PAINTED
8. Substance Currently or Last Stored in Greatest Quantity by Volume (Mark all that apply ☒)	a. Empty	☐	☐	☐	☐	☐
	b. Petroleum					
	Diesel	☐	☐	☐	☐	☐
	Kerosene	☐	☐	☐	☐	☐
	Gasoline (including alcohol blends)	☐	☐	☐	☐	☐
	Used Oil	☐	☐	☐	☐	☐
	Other, Please Specify			LACQUER DILUENT	ISOPROPYL ALCOHOL	
	c. Hazardous Substance	☒	☒	☐	☐	☒
Please Indicate Name of Principal CERCLA Substance OR Chemical Abstract Service (CAS) No		BUTYL ALCOHOL 71363	XYLENE 1330207	64742-95	67630	ISOBUTYL ALCOHOL 78-83
Mark box ☒ if tank stores a mixture of substances		☐	☐	☐	☐	☐
	d. Unknown	☐	☐	☐	☐	☐
9. Additional Information (for tanks permanently taken out of service)						
a. Estimated date last used (mo/yr)		/	/	/	/	/
b. Estimated quantity of substance remaining (gal.)						

Owner Name (from Section I) SHERWIN - WILLIAMS Location (from Section II) CHICAGO Page No. 3 of 3 Pa

VI. DESCRIPTION OF UNDERGROUND STORAGE TANKS (Complete for each tank at this location.)

Tank Identification No. (e.g., ABC-123), or Arbitrarily Assigned Sequential Number (e.g., 1,2,3...)		Tank No. 616	Tank No. 617	Tank No. 618	Tank No. 1	Tank N
1. Status of Tank (Mark all that apply ☒)	Currently in Use	☒	☒	☒	☐	☐
	Temporarily Out of Use	☐	☐	☐	☐	☐
	Permanently Out of Use	☐	☐	☐	☐	☐
	Brought into Use after 5/8/86	☐	☐	☐	☐	☐
2. Estimated Age (Years)		12	12	12	3	
3. Estimated Total Capacity (Gallons)		8000	8000	8000	1000	
4. Material of Construction (Mark one ☒)	Steel	☒	☒	☒	☒	☐
	Concrete	☐	☐	☐	☐	☐
	Fiberglass Reinforced Plastic	☐	☐	☐	☐	☐
	Unknown	☐	☐	☐	☐	☐
	Other, Please Specify					
5. Internal Protection (Mark all that apply ☒)	Cathodic Protection	☐	☐	☐	☐	☐
	Inter or Lining (e.g., epoxy resins)	☐	☐	☐	☐	☐
	None	☒	☒	☒	☒	☐
	Unknown	☐	☐	☐	☐	☐
	Other, Please Specify					
6. External Protection (Mark all that apply ☒)	Cathodic Protection	☐	☐	☐	☐	☐
	Painted (e.g., asphaltic)	☒	☒	☒	☒	☐
	Fiberglass Reinforced Plastic Coated	☐	☐	☐	☐	☐
	None	☐	☐	☐	☐	☐
	Unknown	☐	☐	☐	☐	☐
	Other, Please Specify					
7. Piping (Mark all that apply ☒)	Bare Steel	☒	☒	☒	☐	☐
	Galvanized Steel	☐	☐	☐	☒	☐
	Fiberglass Reinforced Plastic	☐	☐	☐	☐	☐
	Cathodically Protected	☐	☐	☐	☐	☐
	Unknown	☐	☐	☐	☐	☐
	Other, Please Specify	PAINTED	PAINTED	PAINTED		
8. Substance Currently or Last Stored in Greatest Quantity by Volume (Mark all that apply ☒)	a. Empty	☐	☐	☐	☐	☐
	b. Petroleum					
	Diesel	☐	☐	☐	☐	☐
	Kerosene	☐	☐	☐	☐	☐
	Gasoline (including alcohol blends)	☐	☐	☐	☒	☐
	Used Oil	☐	☐	☐	☐	☐
	Other, Please Specify		ISOBUTYL ISOBUTYRATE	ISOAMYL ACETATE		
	c. Hazardous Substance	☒	☐	☐	☐	☐
Please Indicate Name of Principal CERCLA Substance OR Chemical Abstract Service (CAS) No		METHYL METHACRYLATE 80626	97858	108214		
Mark box ☒ if tank stores a mixture of substances		☐	☐	☐	☐	☐
	d. Unknown	☐	☐	☐	☐	☐
9. Additional Information (for tanks permanently taken out of service)	a. Estimated date last used (mo/yr)	/	/	/	/	
	b. Estimated quantity of substance remaining (gal.)					
	c. Mark box ☒ if tank was filled with inert material (e.g., sand, concrete)	☐	☐	☐	☐	☐

APPENDIX XIV - STORAGE TANK INFORMATION

List 3

Flammable - Volatile - Explosive - Corrosive Material

Specific Name	Method of Storage	Quantity/gal	Reportable Spill Quantity/lbs
Xylene	Tank 602 ABV	25,000	1,000
Naphtha 50 Flash	Tank 604 ABV	25,000	100
Toluene	Tank 605 ABV	25,000	1,000
Styrene	Tank 608 ABV	15,000	1,000
MIBK	Tank 609 ABV	15,000	5,000
Highly Aromatic Naphtha	Tank 620 ABV	15,000	---
Di-Isobutyl Phthalate	Tank 621 ABV	15,000	---
Cyclohexanone	Tank 622 ABV	15,000	5,000
Mineral Spirits 100 Flash	Tank 623 ABV	15,000	---
Styrene	Tank 624 ABV	15,000	100
N-Butyl Acetate	Tank 625 ABV	15,000	5,000
Aromatic Naphtha	Tank 638 ABV	15,000	---
Methyl-Ethyl Ketone	Tank 639 ABV	15,000	5,000
Butyl Cellosolve	Tank 640 ABV	15,000	---
Styrene	Tank 641 ABV	15,000	1,000
Minerals Spirits	Tank 644 ABV	100,000	---
Dehydrated Castor Oil	Tank 222 ABV	24,000	---
Soya Oil Alk. Ref.	Tank 643 ABV	60,000	---
Alk. Refined Linseed	Tank 691 ABV	19,000	---
TMPP	Tank 697 ABV	16,000	---
Butyl Alcohol	Tank 610 U	8,000	5,000
Lacquer Diluent	Tank 612 U	8,000	---
2-Ethoxy Ethyl Acetate	Tank 613 U	8,000	---
Isobutyl Alcohol	Tank 614 U	8,000	5,000
Methyl Methacrylate	Tank 616 U	8,000	1,000
Resinous Polyol	Tank 617 U	8,000	---
Isopropyl Acetate	Tank 618 U	8,000	---
Raw Tung Oil	Tank 226 ABV	24,000	---
Dehydrated Castor Oil	Tank 227 ABV	25,000	---
Copal Type Resin	Tank 230 ABV	25,000	---
Empty	Tank 231 ABV	10,000	---
Raw Castor Oil	Tank 232 ABV	10,000	---
Blown Castor Oil	Tank 249 & 255 ABV	10,000	---
Ortho Cresol Soln	Tank 1 ABV	1,000	---
Linseed Copol Mod. Soya Alk.	Tank 2 ABV	5,000	1,000
Linseed - Non-Break	Tank 3 & 4 ABV	5,000	---
Glycerine	Tank 1,2,3 B U	5,000	---
Tall Oil	Tank 4 & 5 B U	5,000	---
Phthalic Anhydride	Tank 142 & 143 ABV	8,000	1,000
12-Carbon Ester Alcohol	Tank 15002 ABV(CEP)	15,000	---
2-Butoxy Ethanol-Butyl Cellslv	Tank 7502 ABV (CEP)	7,500	---
2 - Butoxyethoxyethanol	Tank 7503 ABV (CEP)	7,500	---
Dirty Solvent	Tank 711 ABV	700	---
Dirty Solvent	Tank 698 ABV	15,000	---
Dirty Solvent	Tank 86,87,88 ABV	5,000	---
Reclaimed Solvent	Tank 690 & 699 ABV	15,000	1,000
Spent Solvent	Tank 85 & 688 ABV	15,000/5,000	1,000

APPENDIX XV

REPORT ON INSPECTION TO DETERMINE COMPLIANCE WITH THE PCB DISPOSAL AND MARKING REGULATIONS

SHERWIN-WILLIAMS COMPANY
11541 CHAMPLAIN AVENUE
CHICAGO, ILLINOIS 60628

MAY 27, 1981

Performed by:

U.S. ENVIRONMENTAL PROTECTION AGENCY
TOXIC SUBSTANCES OFFICE
230 SOUTH DEARBORN STREET
CHICAGO, ILLINOIS 60604

PCB COMPLIANCE INSPECTION REPORT

I. COMPANY IDENTIFICATION

Sherwin-Williams Co.
11541 Champlain Avenue
Chicago, IL 60628
(312)821-3028

RESPONSIBLE OFFICIAL

Mr. R. T. Rehor, Site Manager

II. DATE OF INSPECTION

May 27, 1981

III. PARTICIPANTS

Company

Mr. Stanley R. Fryzel, Safety-Security Manager
Mr. Walter W. Golat, Site Maintenance Manager
Mr. Stephen Rukavina, Senior Electrical Engineer

U.S. EPA-Region V

Mr. Anthony Restaino, Environmental Protection Specialist, 5AHTM(Author)
Ms. Patricia Kurcz, Physical Scientist, 5AHTM

IV. OBJECTIVES

This inspection was made to document the company's PCB handling, storage and disposal practices and determine its compliance with the Federal PCB Disposal and Marking Regulations defined in 40 CFR Part 761 and published in Part VI of the May 31, 1979 Federal Register.

V. DESCRIPTION OF COMPANY

Sherwin-Williams Co. (SIC 2851) is involved with the manufacturing of paints, lacquers, chemicals, varnishes and containers. The company is separated into four divisions, producing various products. The Chemical Coating Division manufactures paints and resins. The Chemical Division primarily produces p-cresol and alkali pigments with small quantities of organic intermediates being manufactured. The Container Division utilizes a stamping process for producing tin cans used for paints, paint thinners, and car waxes. The Consumer Division manufactures water base paints. The firm employs approximately 1700 people and is located on 123 acres in an industrial area. The company is capitalized for over $100 million.

Monsanto sales records available to the U.S.EPA indicate that at least 42,000 pounds of Aroclor and PCB heat transfer oils were purchased by Sherwin-Williams Co.

VI. INSPECTION SUMMARY

A. Hydraulic Systems

During the chemical processes, the plant utilizes 19 hydraulic systems which are primarily involved with cold applications. These systems included one Palletizer, four Tote Tilter systems, six Sigma Blade Mixers (Flushers) and eight Plate and Frame Filter Presses, having a combined central hydraulic reservoir system. The company has no records of PCB hydraulic oils used in their hydraulic systems, nor have they undertaken a PCB testing program. Non-PCB Viscosity PTO 68 AZ oil is currently being used in their hydraulic machines. The hydraulic oil capacity for all hydraulic systems combined is approximately 1115 gallons. Most of the hydraulic systems are more than ten years old.

B. Heat Transfer Systems

The company has several heat transfer systems which are involved with their manufacturing processes. The steam heat process is the major heat treat system and is utilized by nearly all Divisions within the plant. In addition, four oil-filled heat transfer systems have been used for specific chemical processes. In the Chemical Coating Division two Dow Therm A and one Therminol 66 fluid-filled heat transfer systems are currently being used. All three heat transfer systems are involved with general long chain polymers which are associated with alkyds, polyesters and modified alkyds. The two Dow Therm A systems have four boilers each and contain 1500 gallons of oil for one system and 1200 gallons for the other. The Therminol 66 heat transfer system has only one boiler which contains 500 gallons of oil.

The fourth oil-filled heat transfer system was used in the Chemical Division for the IPN process. In February 1981, the system went off-line and, according to company officials, the system may or may not be used in the future. At the time of the inspection, all 500 gallons of Therminol 66 was drained from the heat treat system and was being stored on site in 55 gallon drums.

The company has no records of purchasing PCB heat transfer fluids for any of the four heat transfer systems, nor have they been tested for PCBs. All oil-filled heat treat systems are more than ten years old.

C. Electrical Equipment

The company has nine in-service transformers with only one of the transformers having a Chlorextol (PCB) nameplate (316 gallons of oil). The remaining eight transformers were not identified as to the type of oil present. The nameplates for those eight transformers were listed only as oil transformers. The company, however, did have two of those transformers tested by General Electric Co. The results showed that one transformer had PCB concentrations greater than 5000 ppm (360 gallons

of oil) while the other was 17 ppm (455 gallons of oil). The company indicated that the remaining 6 untested oil transformers (2259 gallons of oil) will be sampled for PCB concentrations in the near future. All nine in-service transformers were marked with PCB labels; however, the company had no annual PCB document for the two PCB transformers listing the quantity of PCB dielectric fluid.

The firm has records of 101 in-service PCB capacitors (15 KVA) located on site. The records, however, showed only location and voltage (KVA) description but no volume of PCB oil.

D. Drainage and Water Systems

The company has designed their cooling water system so that any cooling water used is treated before discharged into the city sewer system. All non-contact cooling process and storm water, along with most sanitary wastes, pass through the plants treatment facility. Sanitary wastes in building bordering 115th Street, however, go directly into the city sewer. Drains leading to the city sewers were absent in the manufacturing or production areas.

E. Storage Areas

Non-PCBs

In-service storage areas contained several 55-gallon drums identified as non-PCB hydraulic, heat transfer and lubricating oils. The types of oils included Monsanto and Dow heat transfer oils and Viscosity hydraulic and lubricating oils. The firm is not knowingly purchasing re-refined oils.

PCBs

Nine out-of-service PCB capacitors (15 KVA) were being stored for disposal in building #302. All capacitors were individually stored on pallets with only one PCB capacitor having a PCB warning label. The storage area consisted of a non-diked dirt floor with no PCB signs indicating that the storage area contained PCB articles. The company had no records showing the number of PCB capacitors being stored for disposal, location description or total quantity of PCB dielectric fluid stored.

Waste Oil

The firm had no waste oils present at the time of the inspection. The company indicated, however, that when waste oils are generated, they reclaim their own oils for later re-use. Only compressor waste oils are disposed of by a waste oil hauler.

VII. SAMPLES

Six oil samples were collected. Four were heat transfer oils taken from the IPM heat transfer system, Dow Therm A (#2-5 reactors, #6-9 reactors)

heat transfer system and Therminol heat transfer system. The fifth and sixth were hydraulic oils taken from the Central reservoir feeding the eight hydraulic presses and the #1 Sigma Blade Mixer.

The summary of the analytical data is given in appendix A.

VIII. FINDINGS AND CONCLUSIONS

annex VI, section 761.45(a)

This section requires an annual document be prepared for facilities that use or store PCBs and PCB items.

At this company, there were no records of the 4 PCB capacitors being stored for disposal.

annex III, section 761.42(b)(1)

This section requires the facility to have a permanent storage area for PCB items being stored for disposal.

At this company, the permanent storage area for PCB items does not have an adquate floor with continuous six inch high curbing and the flooring and curbing is not constructed of continuous smooth and impervious materials.

annex III, section 761.42(c)(5)

This section requires PCB items in storage to be checked for leaks at least once every 30 days.

At this company, no records were available to indicate the monthly checks for leaks were being performed.

annex III, section 761.42(c)(8)

This section requires PCB items to be dated on the item when they are placed into storage.

At this company, no storage dates were listed on the PCB items being stored.

subpart C, section 761.20(a)(3)

This section requires PCB large high voltage capacitors to be marked with a PCB sign.

At this company, several PCB capacitors were not labeled with the PCB sign.

subpart C, section 761.20(a)(10)

This section requires each storage area used to store PCBs and PCB items for disposal to be marked with a PCB sign.

At this company, the storage area was not marked with a PCB sign.

APPENDIX A

PCB Sample Analyses[1]-SHERWIN-WILLIAMS COMPANY

Sample[2] Number	Description	PCB, ppm
81TS30S01	Heat Transfer Oil-IPM System, Bldg. 670	[3]ND, 10
81TS30S02	Hydraulic Oil-Central Reservoir Feeding Presses	ND, 10
81TS30S03	Hydraulic Oil-#1 Sigma Blade Mixer	ND, 10
81TS30S04	Heat Transfer Oil-Dow Therm A #2-5 Reactors	ND, 10
81TS30S05	Heat Transfer Oil-Dow Therm A #6-9 Reactors	ND, 10
81TS30S06	Heat Transfer Oil-Therminol System	ND, 10

[1]Analyses done by Hazleton Environmental Sciences, 1500 Frontage Road, Northbrook, Illinois; FY-82 Funds Allocated to A&HM, TMB for Laboratory Analyses.

[2]Data Set: Other 1050

[3]ND, 10 - not detected; less than 10 ppm

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

Facility Inspected:

Sherwin-Williams

Date(s) Inspected:

May 27, 1981

Name of Chief Officer of business:

Date mailed to Chief Officer:

Name of Person at the facility to Whom this notice given:

W.W. GOLAT AND S. RUKAVINA

Title

Name of EPA Inspector: PATRICIA J KU

Address: 230 So. Dearborn St.
Chicago, Illinois 60604

It is possible that EPA will receive public requests for release of the information obtained by inspectors during inspection of the facility indicated above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552, EPA regulations issued thereunder, 40 CFR Part 2, and the Toxic Substances Control Act Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the agency determines that the data contains information entitled to confidential treatment.

In order to facilitate the Agency's timely response to any public inquiries, while giving due consideration to your company's right to request confidentiality, please provide us with a statement specifying any information which our inspection of the above indicated facility may reveal which you believe should be entitled to confidential treatment.

Your statement should be addressed to Mr. Paul Meriage 230 So. Dearborn Street, Chicago, and should reach this address no later than 30 days after receipt of this notice. Failure by your firm to submit, within the 30 day time period, a written request that information be characterized as confidential or privileged will be treated by EPA as a waiver by your company of any claims for confidentiality regarding the inspection data and the data will be made available to the public without further notice to you.

Signature of Plant Manager or Chief Officer of Business

X [signature] Date 5/27/81

Mgr. Safety - Security

U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTICE OF INSPECTION

ADDRESS (EPA Regional Office)
Region V, 230 So. Dearborn St.
Chicago, Illinois

DATE: May 27, 1981

HOUR: 11:00 A.M. P.M.

NAME OF INDIVIDUAL	TITLE
X J R Lynch	Mgr Safety - Security
FIRM NAME	**FIRM ADDRESS (Number, Street, City, State and Zip Code)**
Sherwin-Williams	11541 S. Champlain Chicago, Il 60628
SIGNATURE OF EPA EMPLOYEE	**TITLE**
Patricia J. Kirby	Physical Scientist

REASON FOR INSPECTION

[XX] XX For the purpose of inspecting (including taking samples, photographs, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures or articles within or associated with such premises have been complied with.

[ ] For the purpose of inspecting (including taking samples, photographs and other inspection activities) a conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their disbribution in commerce (including records, files, papers, processes, controls and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures or articles within or associated with the conveyance have been complied with.

[ ] In addition, this inspection extends to (circle appropriate letters):

A) Financial data

B) Sales data

C) Pricing data

D) Personnel data

E) Research data

The nature and extent of inspection of such data specified in A through E above is as follows:

ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

Other 1050

CEIPT FOR SAMPLES AND DOCUMENTS

DATE May 27, 1981

ıe of Indidivual | Title

STANLEY FRYZEL | MGR. SAFETY - SECURITY

rm Name | Address (Street, City, State, - Zip Code)

Sherwin-Williams | 11541 S. Champlain
Chicago, Il 60628

ıple Number(s)

8ITS30501 to 8ITS30506

ımples Collected (Describe fully, List source, location, and other positive identification)
The following samples and documents were collected by the U.S. Environmental Protection Agency and receipt is hereby acknowledged pursuant to Section 11 of the Toxic Substances Control Act (TSCA, 15 USC 2601 et seq.).

SAMPLES

8ITS30501 - Oil Sample - HEAT TRANSFER FLUID FROM 1PM System Building 670

8ITS30502 - Oil Sample - Hydraulic oil CENTRAL RESERVOIR FEEDING PRESSES BUILDING 890 PRESS ROOM

8ITS30503 - Oil Sample - Hydraulic oil From #1 SIGMA BLADE MIXE

8ITS30504 - Oil Sample - HEAT TRANSFER FLUID DOWTHERM A #3-5 REACTORS

8ITS30505 - Oil Sample - HEAT TRANSFER FLUID DOWTHERM A #6-9 REACTORS

8ITS30506 - Oil Sample - HEAT TRANSFER FLUID THERMINOL System

ıOWLEDGEMENT OF COMPANY - The undersigned acknowledges that the samples and documents own above were obtained from the sources indicated.

ıgnature (Owner, Operator, or Agent) | Title (Owner, Operator, or Agent)

Steven P. Sleppy Mgr - Safety - Security

☒ Duplicate samples requested and provided ☐ Duplicate Samples Not Requested

e of Collector (Print or Type) | Title of Collector | Signature of Collector

Patricia J. Kurcz | Physical Scientist | Patricia J. Kurcz

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION V
A&HM/TOXICS XXXXXXXXXXXXX
CHAIN OF CUSTODY RECORD

Other 1050

DISCHARGER

SAMPLES SOURCES
CITY AND STATE

Sherwin-Williams
11541 S. Champlain
Chicago, Il 60628

SAMPLE INVENTORY AND MASTER PACKING LIST

Chest or Carton No.	Seal No.	CRL Sample Log No.	Sample Sub-Portions (Preservative Codes)	Total
		81TS30S01	vial (oil)	
		S02	vial (oil)	
		S03	vial (oil)	
		S04	vial (oil)	
		S05	vial (oil)	
		S06	vial (oil)	
		R07	vial empty	
No. Chests			No. Samples	7

CUSTODY SIGNATURES

The persons whose signatures are listed below certify that the collected samples listed in the sample inventory and master packing list above had the samples in their custody and the only manner in which custody was given up was either to one of the other persons listed below or to a locked and/or secured area or chest.

SAMPLER(S) Anthony Restaino 5/28/81 10:50 AM

Signature / Date and Time

Transmitted to William Smith Jr. 5/28/81 10:50 A.M.
Signature / Date and Time

Other 1050

Transmitted to

Transmitted to

Transmitted to

Transmitted to

ENVIRONMENTAL PROTECTION AGENCY, REGION V BASIC DATA FORM

Initial

DIVISION/BRANCH AGHM/TOXICS

Sampling Date May 27, 1981 (Day Month Year)

Lab Arrival Date May 28, 1981 (Day Month Year)

Analysis Due Date ____ (Day Month)

D.U. NUMBER D30011

ACTIVITY TOXIC ENFORCEMENT

Study Sherwin-Williams Chicago, Il

Thu 1050

All units are micrograms per liter or milligrams per kilogram

Hold For Bremer & Confact

Water	39475	39492	39498	39500	39504	39508			
CRL Sample Log Number			Aroclor 1242	Aroclor 1243	Aroclor 1254	Aroclor 1260			CON
Sediment			39499	39503	39507	39511			
BDTG30S01			K10	K10	K10	K10		vial	(oil)
S02			K10	K10	K10	K10		vial	(oil)
S03			K10	K10	K10	K10		vial	(oil)
S04			K10	K10	K10	K10		vial	(oil)
S05			K10	K10	K10	K10		vial	(oil)
S06			K10	K10	K10	K10		vial	(oil)
R07			K10	K10	K10	K10		vial	empty

GF 10/27/81

[illegible] 10/28/81

Transmitted 10/29/81 [illegible]

RECEIVED NOV 05 1981

Col 3-7 vials [illegible] [illegible] [illegible] [illegible] 102 [illegible] [illegible]

29 DEC 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

5C-15

Ms. Deborah Wamsley
The Sherwin-Williams Company
101 Prospect Avenue, N.W.
Cleveland, Ohio 44115

Re: Sherwin - Williams Company
Docket No. TSCA-V-C-062

Dear Ms. Wamsley:

Enclosed please find a fully executed Consent Agreement and Final Order regarding the above-referenced case. The other original was filed today with the Regional Hearing Clerk. Payment of the settlement figure in the amount of TWO THOUSAND DOLLARS ($2,000.00) as stated in the Order, is due within twenty days of receipt of this letter. Payment by corporate check will be acceptable. Please send your payment directly to the Regional Hearing Clerk.

Thank you for your cooperation. If you have any further questions about this matter, please do not hesitate to contact me at 312-886-6733.

Sincerely,

Eileen R. Bloom
Assistant Regional Counsel

Enclosure

cc: Hon. Spencer T. Nissen (w/encl)
Administrative Law Judge

bcc: Wrich/Bremer/Simon/Polston (W/encl) ✓
Klehan (W/encl)
R. Walker, 5MF (W/encl)
Regional Hearing Clerk

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

IN RE:	
SHERWIN-WILLIAMS COMPANY CHICAGO, ILLINOIS	DOCKET NO. TSCA-V-C-062
an Ohio Corporation	CONSENT AGREEMENT AND FINAL ORDER

CONSENT AGREEMENT

WHEREAS:

1. This civil administrative proceeding for the assessment of a penalty was initiated pursuant to Section 16(a) of the Toxic Substances Control Act (TSCA), 15 U.S.C. §2615(a).

2. A Complaint and Notice of Opportunity for Hearing was filed by Complainant on July 16, 1982, charging that Respondent violated Section 15 of TSCA, 15 U.S.C. §2614(1), and implementing regulations, 40 CFR §§761. et seq. These violations occurred at Respondent's facility in Chicago, Illinois. They were observed by inspectors of the United States Environmental Protection Agency (U.S. EPA) during an inspection of that facility on May 27, 1981.

3. The parties discussed settlement of this action in informal conferences on several occasions through Ms. Deborah Wamsley, attorney for Respondent, and Ms. Eileen R. Bloom, attorney for U.S. EPA.

WHEREFORE, for the purpose of this proceeding only and without prejudice to any other proceeding:

1. Respondent Sherwin Williams Company hereby admits the jurisdictional allegations contained in the Complaint.

2. Respondent neither admits nor denies the factual allegations set forth in the Complaint.

3. Respondent explicitly waives its right to request a hearing on the allegations of the Complaint filed herein.

4. Respondent consents to the issuance of the Final Order hereinafter recited.

ORDER

1. Respondent shall within twenty (20) days of receipt of this signed Consent Agreement and Final Order, pay by cashier's or certified check TWO THOUSAND DOLLARS ($2,000.00), payable to the Treasurer of the United States of America. Such payment shall be remitted to the Regional Hearing Clerk, U.S. Environmental Protection Agency, Region V, 230 South Dearborn Street, Chicago, Illinois 60604.

2. Refusal to comply with the terms of this Order will result in the referral of this matter to the United States Attorney General for collection.

Vice President, General Counsel & Corporate Secr
For Sherwin Williams Company

Dated: 12/27/82 At: Chicago, IL

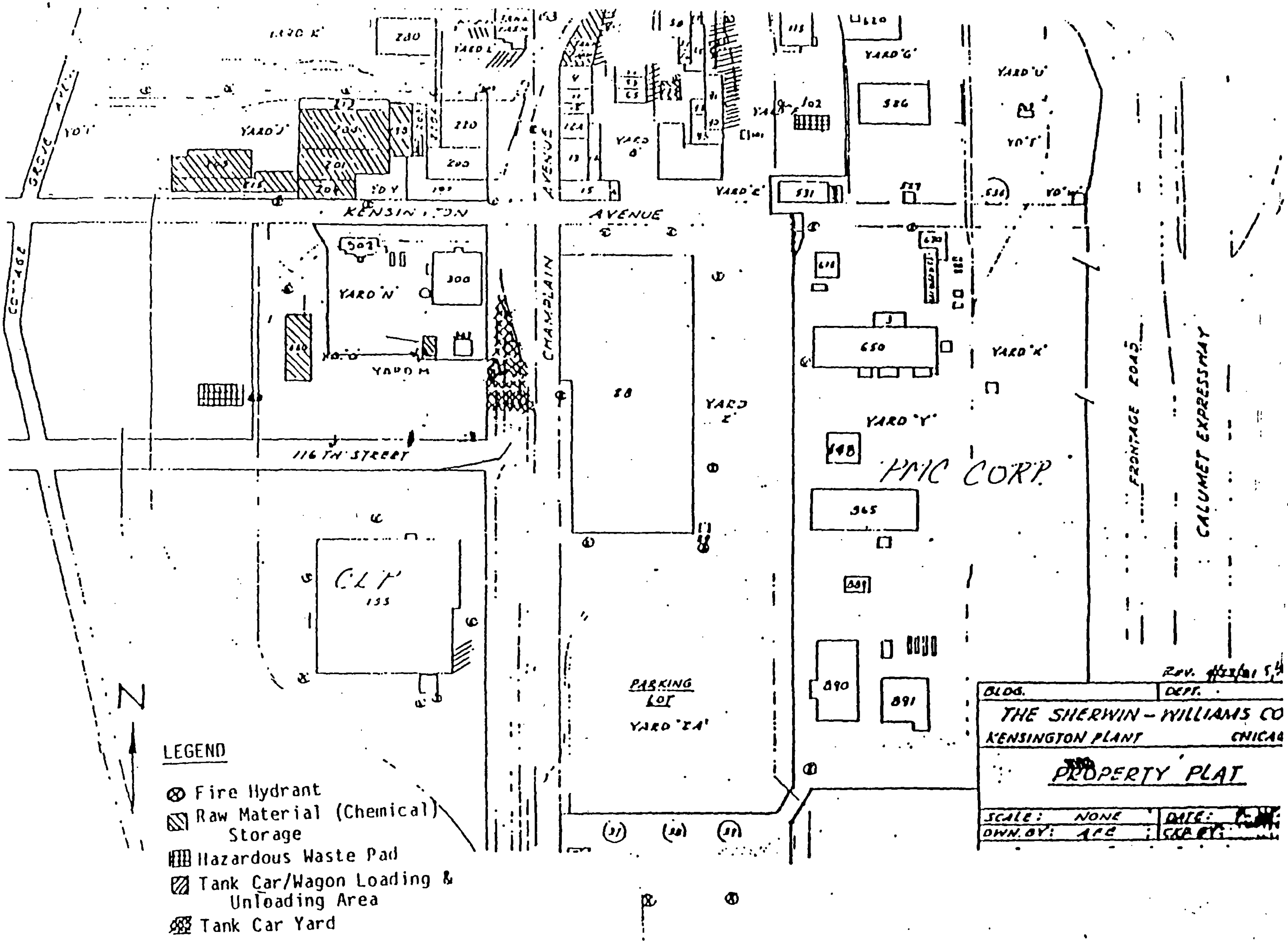
Basil G. Constantelos, Director
Waste Management Division
Region V
U.S. Environmental Protection Agency
230 S. Dearborn Street
Chicago, Illinois 60604

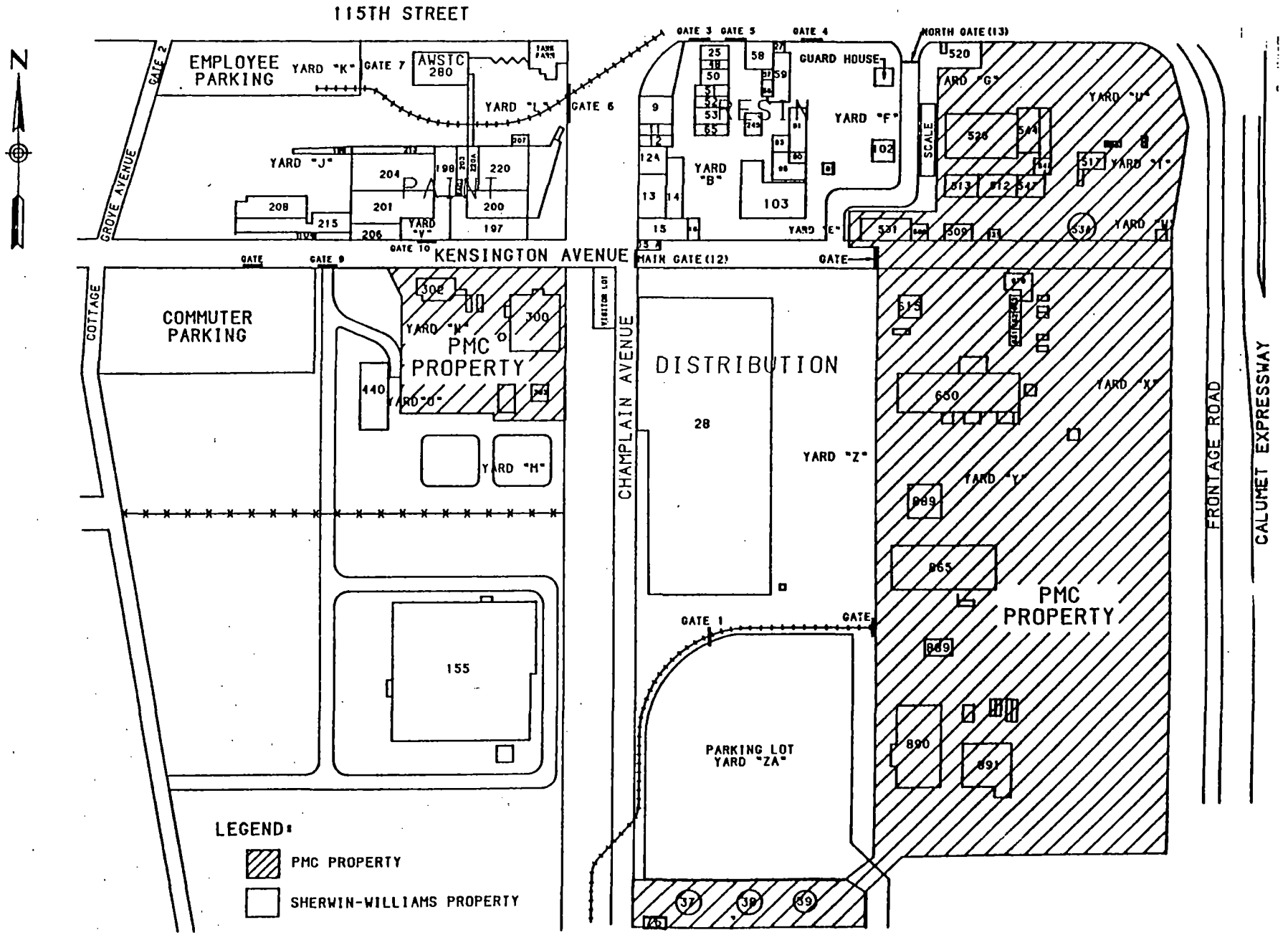
It is so Ordered as agreed to by the parties.

Valdas V. Adamkus
Regional Administrator
Region V
U.S. Environmental Protection Agency
230 S. Dearborn Street
Chicago, Illinois 60604

Dated: 12/27/82 At: CHICAGO, ILL.

APPENDIX XVI - SHERWIN-WILLIAMS PROPERTY PLAT


KENSINGTON AVENUE
CHAMPLAIN AVENUE
116TH STREET
COTTAGE GROVE AVE.
FRONTAGE ROAD
CALUMET EXPRESSWAY
YARD 'N'
YARD M
YARD 'K'
YARD 'Y'
YARD 'G'
YARD 'U'
YARD 'ZA'
PMC CORP.
CLP
155
300
650
565
890
891
PARKING LOT
LEGEND
Fire Hydrant
Raw Material (Chemical) Storage
Hazardous Waste Pad
Tank Car/Wagon Loading & Unloading Area
Tank Car Yard
N
BLDG.
DEPT.
THE SHERWIN-WILLIAMS CO
KENSINGTON PLANT
PROPERTY PLAT
SCALE: NONE
DATE:
DWN. BY:


115TH STREET
N
EMPLOYEE PARKING
YARD "K"
GATE 7
AWSTC 280
YARD "L"
GATE 6
GATE 2
GROVE AVENUE
YARD "J"
204
198
220
PAINT
208
201
200
215
206
YARD "V"
197
GATE 10
GATE 3
GATE 5
GATE 4
NORTH GATE (13)
GUARD HOUSE
RESIN
YARD "F"
YARD "B"
103
102
SCALE
YARD "G"
YARD "U"
YARD "T"
YARD "E"
YARD "W"
GATE
GATE 9
KENSINGTON AVENUE
MAIN GATE (12)
GATE
COTTAGE
COMMUTER PARKING
302
300
YARD "N"
PMC PROPERTY
440
YARD "O"
YARD "H"
155
VISITOR LOT
CHAMPLAIN AVENUE
DISTRIBUTION
28
YARD "Z"
650
YARD "X"
YARD "Y"
865
PMC PROPERTY
GATE 1
GATE
849
PARKING LOT YARD "ZA"
890
891
FRONTAGE ROAD
CALUMET EXPRESSWAY
LEGEND:
PMC PROPERTY
SHERWIN-WILLIAMS PROPERTY

APPENDIX XVII - STATE NOFICATION FORMS

U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION V

CENTRAL DISTRICT OFFICE

STATE NOTIFICATION OF INSPECTION

Authority: X SECTION 114(d)(1)-CLEAN AIR ACT, AS AMENDED

____ CWA, ____ TSCA, ____ RCRA, ____ SWDA

Source Name SHERWIN - WILLIAMS

Address 11541 S. CHAMPLAIN, 11700 COTTAGE GROVE

City CHICAGO

State IL

Person Notified SY LEVINE

Title

Organization IEPA

ate of Notification 8/13/90

anned Date of Inspection 8/20-24/90

Purpose of Inspection (compliance monitoring, Enforcement Division request etc.)

MULTI-MEDIA (GET)

Scope AIR SOURCES

Person Giving Notice HOWARD H. A. CAINE

Title ENVIRONMENTAL ENGINEER

Organization ESD- CENTRAL DISTRICT OFFICE

Howard H. A. Caine
(signature)

USEPA-ESD-CDO
(organization)

U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION V

Central DISTRICT OFFICE

STATE NOTIFICATION OF INSPECTION

Authority: ____ SECTION 114(a)(1)-CLEAN AIR ACT, AS AMENDED

____ CWA, ____ TSCA, ✓ RCRA, ____ SWDA

Source Name: Sherwin Williams

Address: 11541 S. Champlain

City: Chicago

State: Illinois

Person Notified: Glenn Savage

Title: (217) 782-9287

Organization: Ill. EPA

Date of Notification: Aug 6, 2001

Planned Date of Inspection: Aug 20-24, 2001

Purpose of Inspection (compliance monitoring, Enforcement Division request etc.)

Scope: RCRA CEI

Person Giving Notice: G. Golliszek

Title: Env. Engr.

Organization: U.S. EPA - Region V -

He said call ... in ...

(signature)

ESD / ...

U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION V

Central DISTRICT OFFICE

STATE NOTIFICATION OF INSPECTION

Authority: ___ SECTION 114(a)(1)-CLEAN AIR ACT, AS AMENDED

___ CWA, ___ TSCA, L RCRA, ___ SWDA

Source Name Steven Williams

Address

City Elgin

State Ill

Person Notified Cliff Gould (~~[illegible]~~)

Title - 345-9780

Organization Ill EPA

Date of Notification Aug 7, 1990

Planned Date of Inspection Aug 20, 1990

Purpose of Inspection (compliance monitoring, Enforcement Division request etc)

Scope RCRA CEI

Person Giving Notice G. Gulasski

Title Env. Engr

Organization U.S. EPA, Region V - ESD/CPB

He will most likely not participate

(signature)

SPCC/UST

U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION V

Central DISTRICT OFFICE

STATE NOTIFICATION OF INSPECTION

Authority: _____ SECTION 114(d)(1)-CLEAN AIR ACT, AS AMENDED

_____ CWA, _____ TSCA, _____ RCRA, _____ SWDA

Source Name: SHERWIN WILLIAMS

Address: 11541 S Champlain

City: CHICAGO, ILL

State: Illinois

Person Notified: Don Klinkee

Title: ~~B~~ - 345-9780

Organization: ILL EPA - Maywood office

Date of Notification: Aug 6, 1990.

Planned Date of Inspection: Aug 2?, 1990

Purpose of Inspection (compliance monitoring, Enforcement Division request etc.)

Scope: SPCC/UST

Person Giving Notice: G. Golubski

Title: Env. Eng.

Organization: US EPA - Region V

[signature]

(signature)

ESD/CDO

(over)

APPENDIX XVIII

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
INSPECTION REPORT

USEPA Number: ILD005456439 IEPA Number:: 0316500003

Facility Name: SHERWIN WILLIAMS COMPANY

Street: 11541 S. Champlain Ave.
City: CHICAGO Telephone: (312) 821-3102
County: COOK State: IL ZipCode: 60628

Type of Facility: Notified as: GEN Regulated as: GEN.
LDF? ___ HPV? ___ 90 Day Follow-up required? Yes: ___ No: ___

Region: ___ Date of Inspection: Aug 21-24 1988 from: 9am to: 4pm
Weather (LDF Only): SUNNY, HOT

Type of Inspection
ISS: ✓ Sampling: ___ Citizen Complaint: ___ Closed: ___ Other: ___
Record Review: ___ Follow-up to Inspection of: ___ Withdrawal: ___

Non Regulated Status
SQG: ___ Claimed Nonhandler: ___ Other (Specify in Narrative): ___

Notification date, 1980, from (initial) or (subsequent) Notif.

Part A
Initial Part A date: 1980 Ammended: ___
Part A Withdrawal requested: ___ Approved by (US)(IL)EPA: ___

Part B Permit Application
Part B Permit called by (US)(IL)EPA on: ___ Permit Due: ___
Part B Permit Submitted: ___ Draft Permit Issued: ___

Enforcement
Has the firm been referred to: USEPA? ___ IAG? ___ County SA? ___
Date(s) of initial referral: ___ ___ ___
USEPA CACO: ___ CAFO: ___ ALJ Decision: ___
Referral to DOJ by USEPA: ___ Federal Court Order Issued: ___
PCB Order Issued: ___ State Court Order Issued: ___

TSD Facility Activity Summary

Activity By Process Code	On Pt A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being Done at Time of Insp?	Exempt per 35 IAC, Sec.	On Annual Report 87	88	89
S01	yes	yes	yes	*	yes		yes	yes	yes
S02	"	"	"	*	yes		yes	yes	yes
T04	"	"	"	*	yes		yes	yes	yes
		* See attached Report							

Operator: SHERWIN-WILLIAMS COMPANY. Telephone #: (312) 821-3102

Street: 11541 S. CHAMPLAIN AVE

City: CHICAGO State: IL Zip Code: 60628

Owner: — SAME — Telephone #:

Street: — SAME —

City: — SAME — State: Zip Code:

Person Interviewed	Title	Telephone #
MR. ROBERT MARTIN	DIRECTOR - ENV. SCI. DIV.	(312) 821-3102

Inspection Participants	Agency/Title	Telephone #
GERALD R GOLUBSKI	U.S. EPA - Region V ENV. ENGR.	(312) 886-1968
HOWARD CAINE	" "	" "

Prepared By	Agency/Title	Telephone #

Summary of Apparent Violations

Area	Class	Section
		SEE

Area	Class	Section
ATTACHED	REPORT	

Area	Class	Section

WASTE DISPOSITION FORM

cility Nai SHERWIN-WILLIAMS COMPANY. USEPA #: ILD005456439 IEPA #: 0316500003

Waste Name (include haz & non-haz special waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #	On 8700-12 *	On 3510-3 *	On Annual Rpt. for 8__ *	8__ *	8__ *	Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
	SEE PAGE 27 of ATTACHED REPORT AND											
	APPENDIX IX.											

* All "No" responses must be explained in the narrative

Facility Name: SHERWIN-WILLIAMS

USEPA Number: ILD 000545643 9 IEPA Number: 0316500003

Sketch of Site: ✓ Accumulation Area(s) ___ Treatment Area(s) ___ Storage Area(s)

___ Disposal Area(s) ___ Entire Site

SEE page 33 of the attached report for a detailed drawing of the facility's RCRA ACCUMULATION AREA.

NARRATIVE

SEE ATTACHED REPORT

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
				PART 722 **GENERATOR STANDARDS** **Subpart A: General**				
OTH	1			**Section 722.111: Hazardous Waste Determination**				
				Has the generator determined if the solid waste it generates is a hazardous waste? Yes ✓ No ___				
				Did the generator follow the procedures specified in this section in making its determination? Yes ✓ No ___				
OTH	1			**Section 722.112: USEPA Identification Number**				
			a	Has the generator obtained a USEPA identification number? Yes ✓ No ___				ILD 005456439
			c	Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes ✓ No ___				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
				PART 722 **GENERATOR STANDARDS** **Subpart B: The Manifest**				
MAN	2			**Section 722.120: General Requirements**				
			a	Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes ✓ No ____ **Note: If the generator has not used a manifest, check "No" in the Apparent Compliance Column and skip to 722.130.**				
			b	Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes ✓ No ____ **Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility.**				
			d	In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes ✓ No ____				ONE SHIPMENT WAS RETURNED TO SHERWIN-WILLIAMS IN 1990. IT WAS SUBSEQUENTLY, REPACKED AND SENT OUT.

	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No
N	2			**Section 722.121: Acquisition of Manifests**				
			a	Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes ✓ No ____ N/A ____				
			b	For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest? **or** For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes ✓ No ____ N/A ____				SEE ATTACHED 1989 ANNUAL REPORT.
AN	2			**Section 722.122: Number of Copies** Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)?				
AN	2			**Section 722.123: Use of the Manifest** For each manifest received, has the generator: 1) Signed the certificate by hand? Yes ✓ No ____ 2) Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes ✓ No ____				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
				3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes ✓ No ____				
				4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes ✓ No ____				
				NOTE: Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest #s.				
			b	Has the generator apparently given the remaining copies of the manifest to the transporter? Yes ✓ No ____				
			c	Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes ____ No ____ N/A ✓				
			d	Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes ____ No ____ N/A ✓				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
				PART 722 **GENERATOR STANDARDS** **Subpart C: Pre-Transport Requirements**				
OTH	1	X		**Section 722.130: Packaging**				
				Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?		✓		AT THE TIME OF THE INSPECTION SEVERAL CONTAINERS WERE IN POOR CONDITION (SEE ATTACHED PHOTOGRAPHS)
OTH	1	X		**Section 722.131: Labeling**				
				Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?		✓		
OTH	1	X		**Section 722.132: Marking**				
			a	Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes ___ No ✓				
			b	Is each package of hazardous waste which is ready for transportation off-site marked with: - The generator's name and address? Yes ___ No ✓ - The manifest document number associated with the container? Yes ___ No ✓ - The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes ___ No ✓				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
OTH	1			**Section 722.133: Placarding** Does the generator have, for the waste it generates, the proper placards to: - Placard the transport vehicle, or - Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? **NOTE: If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain.**			✓	The facility does NOT TRANSPORT WASTES OFFSITE.
OTH	1	X		**Section 722.134: Accumulation Time** **NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.**				NOTE: FACILITY IS REPORTED AS A GENERATOR, BUT IN FACT STORES WASTES beyound 90 days
			a	**For waste in containers, has** the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers listed below: **NOTE: If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.** **Condition of Containers (Section 725.271)** Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part? Yes ___ No ✓ N/A ___				SEVERAL HAZARDOUS WASTES CONTAINERS WERE IN POOR CONDITION AT THE TIME OF THIS INSPECTION (SEE ATTACHED PHOTOGRAPHS)

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No
				Compatibility of Waste with Container (Section 725.272) Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired? Yes ___ No ✓ **Management of Containers (Section 725.273)** Are containers of hazardous waste always closed during storage? Yes ___ No ✓ Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes ___ No ✓ **Inspections (Section 725.274)** Is the owner or operator inspecting areas where the containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes ___ No ✓ **NOTE: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done.** **Special Requirements for Ignitable or Reactive Wastes (Section 725.276)** Are containers holding ignitable or reactive waste located at least 50 feet from the property line? Yes ✓ No ___ N/A ___				SEE ATTACHED PHOTOGRAPHS NUMEROUS HAZARDOUS WASTE CONTAINERS WERE STORED OPEN (SEE ATTACHED PHOTOGRAPHS). MANY CONTAINERS WERE IN POOR CONDITION.

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
				Special Requirements for Incompatible Wastes (Section 725.277) Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section? Yes ___ No ✓ N/A ___				It is doubtful if containers are checked for compatibility before use.

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				FOR WASTE IN TANKS, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J: Tank Systems listed below: **NOTE: If no waste in tanks, mark N/A and skip to "For waste in containers ...", Subsection a)2) page GEN-C-14.** **Assessment of Existing Tank Systems (Section 725.291)** For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes ____ No ____ **NOTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.** Does this assessment consider at least the following: 1) available standards for the tank and ancillary equipment; 2) hazardous characteristics of the wastes; 3) existing corrosion protection measures; 4) age of the tank system; and 5) results of a leak test, internal inspection, or other tank integrity examination? Yes ____ No ____				SEE page 28 of this report concerning process tanks

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				Design and Installation of New Tank Systems or Components (Section 725.292) For new tanks (built after July 14, 1986) was an independent, certified written assessment prepared? Yes ____ No ____ Does the assessment include, at a minimum, the following: 1) design standard for tanks and ancillary equipment; **NOTE: These standards should include protection from damage from vehicular traffic, adequate foundations, anchoring to prevent flotation or dislodgement, and withstanding the effects of frost heave.** 2) hazardous characteristics of the waste; and 3) evaluation of potential for corrosion and corrosion protection measures? Yes ____ No ____ Has the owner obtained and kept on file at the facility the certifications of the design and installation requirements of Subsections (b) through (f)? Yes ____ No ____ **Containment and Detection of Releases (Section 725.293)** Does an existing tank, which stores F020, F021, F022, F023, F026 or F027 waste(s) have secondary containment (secondary containment is required by January 12, 1989)? Yes ____ No ____ N/A ____				N/A

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
				For an existing tank, of known age, which stores any hazardous waste, is secondary containment provided (secondary containment is required by January 12, 1989 or when the tank is 15 years old, whichever is later)? Yes ____ No ____ N/A ____ For an existing tank of unknown age, has secondary containment been provided by January 12, 1995? Yes ____ No ____ N/A ____ **or** If the facility is older than 7 years, by the time the facility reaches 15 years of age or January 12, 1989, whichever is later? Yes ____ No ____ N/A ____ For tanks that store wastes that are listed as hazardous after 1/12/87, has secondary containment been provided on the same basis as required in Subsections (a)(1) through (a)(4) of 725.293 substituting the date that a material becomes a hazardous waste for 1/12/87? Yes ____ No ____ N/A ____ Is the secondary containment system designed, installed and operated to prevent migration of wastes out of the system, and capable of detecting and collecting releases? Yes ____ No ____ N/A ____ **NOTE: To meet the requirements of Subsection (b) secondary containment must comply with the physical requirements given in Subsection (c)(1) through (4) (compatible liner, foundation, leak detection system).** Are spilled or leaked wastes and accumulated precipitation removed from the secondary containment within 24 hours? Yes ____ No ____ N/A ____				N/A

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				NOTE: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation. Does the secondary containment have one or more of the following: 1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes ____ No ____ N/A ____ **NOTE: Liners, vaults or double-walled tanks must also comply with the requirements of Section 725.293, Subsection (e) or "No" should be marked and explained in the comment.** Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for: 1) above ground piping (exclusive of flanges, joints, valves and connections) that are inspected daily; 2) welded flanges, joints and connections that are inspected daily; 3) sealless or magnetic coupling pumps that are inspected daily; and 4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily? Yes ____ No ____ N/A ____ Until such time as secondary containment is provided, are the following requirements being met for all tank systems:				SHERWIN-WILLIAMS MANAGES FOUR 20,000 GALLON WASH SOLVENT TANKS WHICH ARE PERIODICALLY PUMPED OUT WHEN NECESSARY. See page 28 of this REPORT

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? Yes ____ No ____ N/A ✓				
				2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes ____ No ____ N/A ✓				
				3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)? Yes ____ No ____ N/A ✓				
				General Operating Requirements (Section 725.294)				
				Are tanks equipped with spill prevention controls (e.g., check valves, dry disconnect couplings) and overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank)? Yes ____ No ____				SHERWIN-WILLIAMS does not have any underground RCRA STORAGE TANKS.
				Is a sufficient freeboard being maintained in uncovered tanks to prevent overtopping by wave or wind action or by precipitation? Yes ____ No ____ N/A ____				
				If a leak or spill has occurred in the tank system, has the owner or operator complied with the requirements of 725.296? Yes ____ No ____ N/A ____				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
				Inspections (Section 725.295) Is the facility operator inspecting and documenting, in an operating record, the results of tank inspection as required in 725.295, Subsections (a) and (b)? Yes ____ No ____ **Response to Leaks or Spills and Disposition of Tank Systems (Section 725.296)** Does the facility have a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use? Yes ____ No ✓ **NOTE: If "No", skip to Closure and Post Closure Care (Section 725.297). If "Yes", answer the following questions.** If a tank or secondary containment system has leaked, has the owner done the following: 1) Ceased using, stopped inflow of wastes? Yes ____ No ____ 2) Removed the waste from the tank system within 24 hours and/or from the secondary containment system within 24 hours? Yes ____ No ____ 3) Taken actions to prevent waste migration and removed and properly disposed of visibly contaminated soil or subsurface water? Yes ____ No ____				N/A. NO TANK SPILLS have been reported

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				4) Reported to the Agency within 24 hours of detection? Yes ____ No ____ **NOTE: Reporting to the Agency is not necessary if less than one pound of material which was immediately contained and cleaned up was spilled.** 5) Within 30 days of detection of a release, submitted a report to the Agency that complies with Section 725.296(d)(3)(A) through (E)? Yes ____ No ____ If the source of the release was from a component of a tank system without secondary containment, has the owner provided secondary containment (that satisfies 725.293) to the component of the system before it is returned to service? Yes ____ No ____ N/A ____ **NOTE: If the component is above ground and can be visually inspected then secondary containment is not needed.** Certification of major repairs. If an extensive repair has been done, then is a certification by an independent, registered professional engineer, that the repaired system is capable of handling hazardous waste available before the tank is returned to service? Yes ____ No ____ N/A ____ Has the certification been submitted within 7 days after returning the tank system to use? Yes ____ No ____ N/A ____				N/A See page 28 concerning four above ground WASTE SOLVENT TANKS

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
				Closure and Post Closure Care (Section 725.297) **NOTE: The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Special Requirements for Ignitable or Reactive Wastes (Section 725.298).** At the time of closure, has the owner removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste (unless 721.103(d) applies)? Yes ____ No ____ Has the closure plan, closure activities, cost estimates for closure and financial responsiblity for tank systems met all requirements specified in Subparts G and H? Yes ____ No ____ If contaminated soils are not removed, then has the tank system performed closure and post closure care in accordance with requirements applicable to landfills (Section 725.410)? Yes ____ No ____ **NOTE: Such a tank system is considered a "Landfill" and shall meet all of the requirements of landfills specified in Subparts G and H.** **Special Requirements for Ignitable or Reactive Wastes (Section 725.298)** Are ignitable or reactive wastes stored in tanks? Yes ____ No ____ **NOTE: If "No", skip to Special Requirements for Incompatible Wastes (Section 725.299).**				See page 28 of the attached report detailing closure activities as prescribed by the U.S. EPA 1989 RCRA Facility Assessment report.

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
				If ignitable or reactive wastes are stored or treated in tanks, then is it in such a way that the waste is protected from material or conditions that may cause it to ignite or react? Yes ____ No ____ **NOTE: Tank systems used solely for emergencies may store ignitable/reactive wastes.** Are there proper protective distances between the waste management area and the facility boundary line? Yes ____ No ____ **Special Requirements for Incompatible Wastes (Section 725.299)** Is Section 725.117 being complied with whenever incompatible wastes are stored in the same tank system or in a tank system which has not been decontaminated? Yes ____ No ____ N/A ✓				N/A

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
			a2	**For waste in containers,** has the generator marked and made visisble for inspection on each container, the date upon which accumulation began? Yes ___ No ✓ N/A ___				SEE ATTACHED PHOTOGRAPHS WITHIN THIS REPORT
			a3	**For waste in containers and tanks,** has the generator marked or labeled each with the words "Hazardous Waste"? Yes ___ No ✓				
			a4	Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart C: Preparedness and Prevention listed below: **Maintenance and Operation of Facility (Section 725.131)** Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to: - Air; - Soil; or - Surface Water, which would threaten human health or the environment? Yes ___ No ✓				FACILITY HAS CONTAINERS OF HAZARDOUS WASTES IN POOR CONDITION

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
				Required Equipment (Section 725.132) Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment: - An internal communications or alarm system capable of providing immediate emergency instructions? Yes ✓ No ___ N/A ___ - A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes ✓ No ___ N/A ___ - Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes ✓ No ___ N/A ___ - Water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic sprinklers or water spray systems? Yes ✓ No ___ N/A ___ **NOTE: Any "N/A" answers must be explained in the Remarks column.**				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
				Testing and Maintenance of Equipment (Section 725.133) Where required, is the facility testing and maintaining, as necessary, to assure proper operation in time of emergency: - Communications/alarm systems? Yes ✓ No ___ N/A ___ - Fire protection equipment? Yes ✓ No ___ N/A ___ - Spill control equipment? Yes ✓ No ___ N/A ___ - Decontamination equipment? Yes ✓ No ___ N/A ___ **NOTE: Any "N/A" answer must be explained in the Comments.** **Access to Communications or Alarm Systems (Section 725.134)** Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 735.132? Yes ✓ No ___ N/A ___ If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes ✓ No ___ N/A ___				Facility has a full time security force on the premises at all times.

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				Required Aisle Space (Section 725.135) Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility? Yes ✓ No ___ N/A ___ **NOTE: Document non-compliance with photograph.** **Arrangements with Local Authorities (Section 725.137)** Has the owner or operator made or attempted to make the following arrangements, as appropriate for the type of waste handled at this facility and the potential need for the services of these organizations: 1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes? Yes ✓ No ___ N/A ___ 2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority? Yes ___ No ___ N/A ✓				Chicago Fire Dept. Chicago Fire Dept. has adequate equipment to meet any emergencies.

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
				3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes ____ No ____ NA ✓ 4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes ✓ No ____ N/A ____ **NOTE: Any "N/A" answer must be explained in the Comments.** Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes ____ No ✓ N/A ____ Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart D: Contingency Plan and Emergency Procedures listed below: **Purpose and Implementation of Contingency Plan (Section 725.151)** Is a plan available? Yes ✓ No ____ **NOTE: If answer is "No", skip to Emergency Coordinator (Section 725.155).**				No refusals were received by Sherwin-Williams

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
				Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes ✓ No ___ Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes ___ No ___ N/A ✓ NO such occurrence has taken place **Content of Contingency Plan (Section 725.152)** Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to: 1) Fires? Yes ✓ No ___ 2) Explosions? Yes ✓ No ___ 3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes ✓ No ___ Does the plan describe the arrangements agreed to by: 1) Local police and fire departments? Yes ✓ No ___ 2) Hospitals? Yes ✓ No ___ 3) Contractors? Yes ___ No ___ 4) State and local emergency response teams? Yes ___ No ___				A copy of the plan is attached within the Appendix of this Report.

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
				Does the plan list the names, addresses and phone numbers (office and home) of all personnel qualified to act as emergency coordinators? Yes ✓ No ____ Is the list of emergency coordinators up-to-date? Yes ✓ No ____ If more than one person is designated as an emergency coordinator, is a primary coordinator identifed? Yes ✓ No ____ Does the plan identify: 1) A list and physical description of all emergency equipment at the facility? Yes ✓ No ____ 2) A brief outline of the capability of each piece of emergency equipment? Yes ✓ No ____ 3) The location of each piece of emergency equipment? Yes ✓ No ____ Is the list of emergency equipment up-to-date? Yes ✓ No ____ Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes ✓ No ____ N/A ____				MR. ROBERT MARTIN IS DESIGNATED AS THE EMERGENCY COORDINATOR.

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
				Does the plan identify the signal to be used to begin evacuation? Yes ✓ No ____ Are alternate evacuation routes identifed? Yes ✓ No ____ **Copies of Contingency Plan (Section 725.153)** Has a copy (and all revisions) of the contingency plan: a) Been maintained at the facility? Yes ✓ No ____ b) Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes ✓ No ____ **Amendment of Contingency Plan (Section 725.154)** Has the contingency plan been reviewed and, if necessary, amended whenever: 1) Applicable regulations are revised? Yes ____ No ____ 2) The plan fails in an emergency? Yes ____ No ____ N/A ✓			✓ ✓	The new plan was prepred and updated in December 1989. (see attached plan)

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes in the response necessary in an emergency? Yes ____ No ____ N/A ✓				
				4) The list of emergency coordinators changes? Yes ____ No ____			✓	NO changes
				5) The list of emergency equipment changes? Yes ____ No ____			✓	
				Emergency Coordinator (Section 725.155) Is there an emergency coordinator on-site or on call at all times? Yes ✓ No ____				
				Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout? Yes ✓ No ____				
				Does the coordinator have the authority to commit the resources to carry out the contingency plan? Yes ✓ No ____				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
				Emergency Procedures (Section 725.156) Has the facility had a release, fire or explosion? Yes ____ No ✓ **NOTE: If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures prescribed in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column of 722.134.**				
			a4	Has the generator complied with the requirements of 35 Ill. Adm. Code 725.116: Personnel Training listed below: **Personnel Training (Section 725.116)** Does the facility have a training program? Yes ✓ No ____ **NOTE: If "No", skip to Subsection (c)1 page GEN-C-26.** Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes ✓ No ____ Is the training program formalized, i.e., written down? Yes ✓ No ____ Is the program directed by a person who has been trained in hazardous waste management procedures? Yes ✓ No ____				A copy of the TRAINING program IS ATTACHED.

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
				Does the program cover, at a minimum: 1) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes ✓ No ___ N/A ___ 2) Key parameters for automatic waste feed cut-off systems? Yes ✓ No ___ N/A ___ 3) Communications or alarm systems? Yes ✓ No ___ 4) Response to fire or explosion? Yes ✓ No ___ 5) Response to groundwater contamination incidents? Yes ___ No ___ N/A ✓ Does the program cover the implementation of the contingency plan? Yes ✓ No ___ Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes ✓ No ___ N/A ___ Has the facility conducted an annual review of the initial training? Yes ✓ No ___ N/A ___				However, it appears that facility personnel are deficient in obeying the subject matter as presented during training.

Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
			Are the following documents and records being maintained at the facility: 1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes ✓ No ___ 2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes ✓ No ___ 3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes ✓ No ___ 4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes ✓ No ___ Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes ✓ No ___ N/A ___				Facility maintains copies of RCRA training. Personnel Dept. has job descriptions on file

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				SATELLITE ACCUMULATION				
			c1	Is the generator who accumulates hazardous waste in containers at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste:				
				- Limiting such accumulation to 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133)? Yes ___ No ✓ N/A ___				
				- Complying with the requirements of:				
				1) 35 Ill. Adm. Code 725.271, Condition of Containers? Yes ___ No ✓				
				2) 35 Ill. Adm. Code 725.272, Compatibility of Waste with Containers? Yes ___ No ✓				
				3) 35 Ill. Adm. Code 725.273(a), Management of Containers - requiring that the containers be stored closed except when waste is being added or removed? Yes ___ No ✓				
				- Marking the containers with the words "Hazardous Waste" or with words that identify the contents of the containers? Yes ___ No ✓				
								AT THE TIME OF THE INSPECTION NUMEROUS (>100) HAZARDOUS WASTE DRUMS WERE LOCATED THROUGHOUT SHERWIN WILLIAMS PROPERTY (THEY WERE NOT LIMITED TO THE RCRA ACCUMULATION AREA). ALSO, AT THE TIME OF THE INSPECTION THERE WERE HUNDREDS OF OTHER DRUMS THAT WERE UNLABELED (QUESTIONABLE CONTENTS?) AND POSITIONED THROUGHOUT THE PREMISES.

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
			c2	Has the generator who accumulates more than 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133(e)) with respect to the amount of excess waste, complied with the requirements in Section 722.134(a) within three days? Yes ____ No ✓ Are the containers with the excess amounts marked with the date accumulation began? Yes ____ No ✓ During the three day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1)? Yes ____ No ✓				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
OTH	2			**PART 722** **GENERATOR STANDARDS** **Subpart D: Recordkeeping and Reporting** **Section 722.140: Recordkeeping** Has the generator retained for a period of three years:				
			a	- A copy of each signed manifest? Yes ✓ No ____				
			b	- A copy of each annual report? Yes ✓ No ____				
			b	- A copy of each exception report? Yes ____ No ____ N/A ✓				
			c	- Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes ✓ No ____ N/A ____				
			d	Does a generator who is involved in any unresolved enforcement action continue to maintain the records required in 722.140(a) thru (c)? Yes ____ No ____ N/A ✓				
			d	If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes ____ No ____ N/A ✓				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
OTH	2			**Section 722.141: Annual Reporting**				
				Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submitted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceeding calendar year?	✓			SEE ATTACHED 1988 and 1989 ANNUAL REPORTS.
				NOTE: A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266.				
MAN	1			**Section 722.142: Exception Reporting**				
			a	Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes ✓ No ___				However, see page 48 of the attached report concerning "operating record".
			b	Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes ___ No ___ ✓ NO such reports filed				
			b	Does any exception report submitted to the Director contain the following:				
				- A legible copy of the manifest for which the generator does not have confirmation of delivery; and			✓	

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
				- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes ____ No ____ N/A ✓				
OTH	1			**Section 722.143: Additional Reporting** Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?				N/A.

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
DTH	1/2			PART 722 GENERATOR STANDARDS Subpart E: Exports of Hazardous Waste Section 722.152: General Requirements Has the facility made any shipments of hazardous waste outside the United States? Yes ___ No ✓ NOTE: If "No", skip Subpart E. If "Yes", answer the next question. Has the generator complied with the requirements in Sections 722.152 through 722.157? Yes ___ No ___ NOTE: If the answer is "No", explain in detail why the firm did not meet the requirements. Review the requirements prior to answering this question. When citing a violation of this Subpart, identify the specific section violated in the Narrative as well as in the Comments.				N/A.

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
				PART 722 **GENERATOR STANDARDS** **Subpart F: Imports of Hazardous Waste**				
MAN	1			**Section 722.160: Imports of Hazardous Waste**				
			b1	Has the person importing hazardous waste met the manifest requirements of Section 722.120 except that: In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used; **and**				- N/A - The facility does NOT accept Hazardous waste from offsite.
			b2	Has the importer or his agent signed the manifest in place of the generator; **and**				
			b2	Has the importer or his agent obtained the signature of the initial transporter? Yes ____ No ____ N/A ____				
			c	Is the person importing hazardous waste using manifests obtained from the Agency? Yes ____ No ____				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	2	X		**PART 722** **GENERATOR STANDARDS** **Subpart G: Farmers** **Section 722.170: Farmers** Is a farmer who is disposing of waste pesticides from his own use which are hazardous wastes: - Triple rinsing each emptied pesticide container in accordance with 35 Ill. Adm. Code 727.107(b)(3), Residues of Hazardous Waste in Empty Containers? Yes ____ No ____ N/A ____ - Disposing of pesticide residue on his own farm in a manner consistent with the disposal instructions on the pesticide label? Yes ____ No ____ N/A ____ **NOTE: If the answer to either of the preceeding questions is "No", the farmer is subject to the requirements of this Part (722) and to the applicable portions of 35 Ill. Adm. Code 702, 703 and 725 (724). Complete the applicable inspection form(s).**				N/A

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: SHERWIN-WILLIAMS COMPANY

U.S. EPA ID No.: ILD 005456439

Street: 11541 S. CHAMPLAIN AVE.

City: CHICAGO State: IL Zip: 60628

Telephone: (312) 821-3102

Inspection Date: 8/22/90 Time: 9am (am/pm)

Weather Conditions: _____

	Name	Agency/Title	Telephone
Inspectors:	GERALD R. GOLUSKI	US EPA	(312) 886-1968
	HOWARD CAINE	"	"
Facility Representatives:	ROBERT MARTIN	DIV. DIRECTOR	(312) 821-3102

See Appendix B to determine which of the following LDR waste categories the facility manages:

	Generate	Transport	Treat	Store	Dispose
F001-F005 Solvents	✓				
F020-F023 and F026-F028					
California List*					
First Third [40 CFR 268.10]					
Second Third [40 CFR 268.11]					
Third Third [40 CFR 268.12]	✓				

* See Appendix A

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

Sherwin-Williams manufactures commercial and household paints. During this process they generate a variety of wastes including Still Bottoms (F005), waste solvents (F005), and phthalic anhydride (U190)

LDR Waste Management:

Wastes are containerized and shipped offsite for disposal.

Summary: Several RCRA container and operational deficiencies were observed at the time of this inspection. See attached report for details

Signature: Gerald R. Schluter

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

A. List waste codes which the facility handles in each of the following LDR categories*:

1. F001 through F005 spent solvents:
   F005
2. F020-F023 and F026-F028 dioxin-containing wastes:
   None
3. California List Wastes (See Appendix A):
   None
4. First Third Wastes [40 CFR 268.10]:
   None
5. Second Third Wastes [40 CFR 268.11]:
   None
6. Third Third Wastes [40 CFR 268.12]**:
   4190 - Phthalic Anhydride

*See Appendix B.
** Note: Effective 09/25/90, large quantity generators and TSDs are required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" wastes. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, even if they are characteristic for a constituent previously covered under the EP toxicity characteristic [55 FR 22531].

B. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?*

   Yes ✓ No ___

   If no, list below:

Assigned Classification	Correct Classification

*Areas of concern include: California List/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single-source leachate; P and U waste codes/F and K wastes; and waste code carry through principle.

Comments: _____

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

Yes ✓ No ___ NA ___

Comments _____

3. Has multi-source leachate been assigned the F039 waste code?* [40 CFR 261.31]

Yes ___ No ___ NA ✓

*Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.

If yes, was single-source leachate combined to form multi-source leachate? [55 FR 22623]

Yes ___ No ___ N/A.

Comments _____

C. Does the facility handle the following wastes (national capacity variances)?

1. F001-F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]

Yes ___ No ✓ List _____

2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.31(b)]

Yes ___ No ✓ List _____

3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(2)]

Yes ___ No ✓ List _____

4. K048-K052 petroleum wastes (nonwastewaters; expires - 11/08/90). [40 CFR 268.35 (b)]

Yes ___ No ✓ List _____

5. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U190, U221, U223, U235 (expires - 06/08/91). [40 CFR 268.34(d)]

Yes ___ No ✓ List _____

6. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A; (expires - 05/08/92). [40 CFR 268.35(e)]

Yes ___ No ✓ List _____

7. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151. (expires -05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

8. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

9. Inorganic solid debris as defined in 40 CFR 268.2(g)*; includes chromium refactory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

*Note: Incorrect reference [40 CFR 268.2(a)(7)] in Third Third rule.

10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92)*. [40 CFR 268.35(d)]

Yes ___ No ✓ List _____

*Note: 40 CFR 268.10 and 268.11 wastes incorrectly omitted from this variance in the Third Third rule.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

Yes ✓ No ___ NA ___

If available, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
F005	___	X
___	___	___
___	___	___

*Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCWE. [40 CFR 268.2(f)(1)]

Comments _____

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

Yes ___ No ✓ NA ___

If yes, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
___	___	___
___	___	___
___	___	___

Comments _____

*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. [40 CFR 268.2(f)]

3. First, Second, and Third Third Wastes:

a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

Yes ✓ No ___ NA ___

If available, list each waste code and

Waste Code	Subcategory	Wast
U190	_____	X
_____	_____	_
_____	_____	_

* Less than 1% TOC by weight and less t
(TSS) with the following exceptions: KO
5% by weight TOC and less than 1% by we
than 4% by weight TOC and less than 1%

Comments_____

b. Do the assigned treatment standards may cause the waste to exhibit any cl

Yes ___ No ___ NA _

c. Does the generator specify alternati

Yes ___ No ___ NA _

*Use of the alternative treatment stanc

If yes, do lab packs only contain the

___ Organometallics: 40 Part 268, A
___ Organics: 40 CFR Part 268, Ap

*Unregulated wastes and hazardous waste commingled in the appropriate Appendix

d. Does the generator specify alternati source leachate?*

Yes ___ No ___ NA ✓

*Use of the alternative treatment standard

4. California List Wastes: Has the generator corr and treatment standard/prohibition level for

a. Liquid hazardous wastes containing

Yes ___ No ✓ NA _

If yes, check the appropriate treatab

___ 50 to 500 ppm PCBs
___ ≥500 ppm PCBs

b. Listed or characteristic wastes containing ≥1,000 mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content

Yes ___ No ___ NA ✓

If yes, check the appropriate treatability group:

N/A

___ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
___ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥130 mg/l thallium

Yes ___ No ___ NA ✓

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ___ No ___ NA ✓

If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ___ No ___ NA ✓

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

Waste Code	Cal List Applicability	Expiration Date
____	_____	__/__/__
____	_____	__/__/__
____	_____	__/__/__

Comments_____

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ___ No ✓ NA ___

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
____	_____	_____	_____
____	_____	_____	_____
____	_____	_____	_____

Comments_____

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes ___ No ✓

If yes, did the generator select the most stringent treatment standards? [40 CFR 268.41(b) and 268.43(b)]

Yes ___ No ___

Comments _____

B. **Waste Analysis**

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]

Yes ✓ No ___

*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ___ No ___

Comments _____

2. Which of the following analytical methods does the generator employ?*

*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

a. Knowledge of waste:

Yes ✓ No ___

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]

_____

_____

b. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?** (BDAT*** = stabilization/immobilization technology)

Yes ✓ No ___ NA ___

*TCLP = Toxicity Characteristic Leaching Procedure (40 CFR Part 268, Appendix I, EPA Test Method 1311).
**See Appendix C for exceptions.
***BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)

Yes ✓ No ___ NA ___

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

d. PFLT*: Was PFLT used to determine if California List constituents were contained in *liquid* hazardous waste?

Yes ___ No ___ NA ✓

*PFLT = Paint Filter Liquids Test [Test Method 9095, EPA Publication No. SW-846]

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7 (a)(5)]

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes ___ No ✓ (If No, go to 4.)

N/A

Does the generator treat the wastes to meet appropriate treatment standards/prohibitions?

Yes ___ No ___

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)]

Yes ___ No ___ (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

___ Based on a detailed chemical and physical analysis of a representative sample
___ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes ___ No ___

Comments _____

4. Dilution Prohibition [40 CFR 268.3]:

a. Does the generator mix prohibited* wastes with different treatment standards?

N/A

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ___ No ✓ (If No, go to b.)

List the wastes _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

Comments _____

b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ___ No ___ (If No, go to c.)

Check appropriate category:

___ Dilutes to meet treatment standards
___ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

___ Managed in treatment systems regulated under the Clean Water Act
___ Non-toxic* characteristic wastes
___ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001(except high TOC nonwastewaters), D002, and D003(except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

_____

c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ___ No ___

Comments _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes ___ No ___ NA ✓

C. Management

1. On-Site Management

a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes ✓ No ___

(If yes, the TSD Checklist must also be completed.)

* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments See ATTached Report Concerning Storage > 90 days

b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

N/A

NO TREATMENT ON SITE

Yes ___ No ___ NA ___

c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ___ No ___ NA ___

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

2. Off-Site Management: Waste Exceeds Treatment Standards

a. Does the generator ship any waste that exceeds treatment standards /prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes ✓ No ___ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
___	SEE ATTACHED 1988 AND 1989 ANNUAL REPORTS
___	
___	

Does the generator provide a notification to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ✓ No ___ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ✓

b. Is a notification sent with each waste shipment?

Yes ✓ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___ See Attached 1988 and 1989 reports in Appendix	
___	___
___	___

N/A Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ✓ No ___ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
See Attached	1988 and 1989 Annual Reports in Appendix
___	___
___	___

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ✓ No ___ (If No, go to d.)

b. Are a notification and a certification sent with each waste shipment?

Yes ✓ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	___
___	___
___	___

N/A Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ✓ (If No or NA, go to 4.)

N/A Complete the following table:

Waste Code	Receiving Facility
___	___
___	___
___	___

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ___ No ___

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

N/A Yes ___ No ✓ (If No, go to 5.)

Complete the following table:

Waste Code	Receiving Facility
___	___
___	___
___	___

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [40 CFR 268.7(a)(3)]

Yes ___ No ___

b. Is a notification sent with each waste shipment?

Yes ___ No ___

N/A

If no, is the waste subject to a tolling agreement pursuant to 40 CFR 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	_____
___	_____
___	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes ✓ No ___

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes ___ No ___ NA ✓

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes ___ No ___ NA ✓

*See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments _____